

BIGHORN NATIONAL FOREST

Final Environmental Impact Statement

for the

Revised Land and Resource Management Plan

Comments and Responses

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Introduction

Appendix J includes either direct comments or representative comments and agency responses to the substantive comments received during the public comment period of July 2004 to September 2004. The public was asked to review the Draft Environmental Impact Statement and the Proposed Revised Land and Resource Management Plan for the Bighorn National Forest by September 30, 2004. A variety of methods were used to inform the public about the DEIS and Proposed Revised Plan. These included direct mailings to interested and potentially affected individuals and organizations, news releases, newspaper inserts, media interviews, two rounds of public meetings near the beginning and end of the comment period, contacts with Cooperators, contacts with other federal and local agencies, Notice of Availability publication in the Federal Register and website posting at www.fs.fed.us/r2/bighorn.

The Bighorn NF received over 18,500 cards, letters, and e-mails in response to the request for comments. Approximately 18,000 cards and e-mails were the result of petitions or websites recommending that individuals submit a standard comment statement. Letters received after the comment period ended were reviewed, but were not formally included in the content analysis process. All cards and letters are available for review at the Forest Supervisor's Office in Sheridan, Wyoming. The content analysis process was conducted according to NEPA regulations at 40 CFR 1503.4 - Response to comments.

Our seven-step process included:

1. Log in letter or card with unique number.
2. Enter commenter's name and address into database.
3. Code substantive comments from each letter/card received.
4. Enter substantive comments into content analysis database.
5. Run reports containing representative comments or summarized comments according to pre-determined categories.
6. Using comments modify alternatives (specifically develop Alternative D FEIS), supplement, improve or modify the analyses, make factual corrections, and when necessary, explain why comments do not warrant further agency response.
7. Prepare agency responses to representative or summarized comments by citing sections in EIS, Plan, regulation, law, other sources where specific comments

were handled. In some instances, the Record of Decision is cited as the location where our response to comments can be found.

Because of the sheer number of comments and issues, similar comments were combined for response. Therefore, while not every comment is listed in this appendix exactly as written by each respondent, each comment was considered individually. Comments and responses are arranged alphabetically according to resource or topic.

Comments and Responses

Goals and Objectives

Goals and Objectives ***Goal 1, Objective 1a, all Strategies need to have an
Comment #1*** ***appropriate monitoring component.***

Monitoring will be conducted to the maximum extent possible and that information will be clarified in the Plan. We agree that monitoring is absolutely necessary to determine status and trend information. The ID Team balanced potential ecosystem risks, management intensity of an activity, and available budgets to determine which strategies, standards, and guidelines have associated monitoring items.

Aquatic habitat data, as well as fish population data is collected cooperatively with the Wyoming Game and Fish Department. With implementation of the Revised Plan, data may be collected more frequently than three years, but at a minimum that information would be collected every five years.

Goals and Objectives ***Goal 1, Objective 1a, Strategy 5 is confusing as stated.
Comment #2*** ***“Within five years, identify and maintain at the 6th-level
watershed scale, at least one representative area for each
ecological subsection (i.e. sedimentary and granitic) on
the forest as a barometer for baseline aquatic habitat
conditions.”***

Monitoring is meant to answer a specific question or identify information needs or gaps. The Forest will use reference watershed conditions to determine effects of or provide a context for management activities in other watersheds. Reference watersheds will be selected based on the most current available data (e.g, Winters et al. 2004) and highest management priority.

Goals and Objectives ***The intent of Goal 1, Objective 1a, Strategy 7 is unclear.
Comment #3*** ***“Provide unobstructed routes to areas critical for
fulfilling life history requirements of aquatic and
riparian dependent species.”***

The strategy is meant to provide passage through road crossings for aquatic dependent species and allow for similar movement through riparian zones for those dependent

species.

Air

Air Comment #1 Forest needs to quantify the effects of different activities on air quality.

We reviewed the environmental consequences section, and found it to be sufficient to meet NEPA requirements for effects disclosure and to help inform a rational decision. While the air effects by alternative were not quantified, the relative effect by alternative for each of the parameters analyzed is displayed.

Quantifying the effects on air quality by management area would be extremely difficult due to the diffuse nature of air and variations in local weather patterns, seasonal variations, etc... Additionally it would be speculative to estimate these effects, as we do not know exactly what activities will actually occur. The EIS states that air quality standards have been met across the Forest and the levels of activities that are expected under the Revised Forest Plan are not anticipated to violate standards.

Aquatics

Aquatics Comment #1 The 100 foot buffer is not sufficient to protect water quality and riparian dependent species.

The 100' riparian zone has been incorporated from Forest Service Regional Direction found in the Water Conservation Practices Handbook (WCPH) Standard 12.1, and is based on the best science available. It was developed by scientists, and the effectiveness has been monitored on the Bighorn NF during project implementation reviews. No changes were made to the Plan or EIS based on this comment.

The WCPH was developed to protect water quality and meet state-designated beneficial uses of water in compliance with the Clean Water Act. Compliance is obtained by meeting or exceeding state water quality objectives using Best Management Practices (BMPs). These standards are meant to give general direction at the programmatic level and site-specific modifications to the 100' foot riparian zone could be addressed at the project level.

The 100' riparian zone is not meant to directly affect aquatic and riparian dependent species, but would potentially have positive indirect effects for these species.

The Revised Plan also includes a 100' to 300' riparian habitat zone, which is designed for the protection of riparian-dependent emphasis species.

Standard 2(i) in the Draft Plan (pg. 1-19), also taken from the WCPH (Standard 13.1), provides additional protection to aquatic ecosystems and water quality issues related to non-point sediment sources.

COMMENTS AND RESPONSES

Aquatics Comment #2 There is concern that 300 foot buffer is a “keep out” zone.

This guideline has been reworded between draft and final to insure that it is not interpreted as a “keep out” zone, because that is not the intent of this guideline. This is further clarified in the implementation guidance found in Revised Plan Appendix A.

Management flexibility within the 300’ riparian habitat zone is allowed for stream restoration activities, prescribed burning, wildlife habitat manipulation, and management for insects and disease. The guideline is better addressed during project implementation and is not a keep out zone to be applied Forest-wide. Revised Plan Appendix A points out the values intended to be considered, including spruce-fir, due to the diversity of habitat values associated with mature spruce-fir.

Aquatics Comment #3 The 300 foot buffer should be a Standard for all activities.

This comment did not result in changes between draft and final. The ID team considered this idea, but determined that a 300’ riparian habitat zone for all activities would not allow for the flexibility of management during project implementation, nor would it be applicable for all streams, because of site-specific differences in stream type, topography, species, etc. It would not allow for other multiple use objectives, or provide the desired management flexibility.

Aquatics Comment #4 Increased water yield can be gained through timber harvest activity, and the Forest needs to consider water yield in its analysis.

This comment did not result in changes between draft and final. The Forest considered water yield during forest plan revision. The effects analysis and record acknowledges the research done by Troendle, et al, at the Fraser Experimental Forest that found that 25% basal area removal in a watershed results in water yield increases. However, as stated in the administrative record, that level of harvest is not sustainable over time and does not achieve other multiple use objectives for water quality, wildlife habitat, or scenery. Therefore, the Revised Plan does not include direction to increase water yield. This is further discussed in FEIS Appendix B and FEIS Chapter 2 (Alternatives Considered but not in Detail). Additional information can be found in the administrative record.

Aquatics Comment #5 Water depletions on the Forest will have an effect on threatened and endangered species in the Yellowstone River system, downstream of the Forest Boundary.

The U.S. Fish and Wildlife Service was contacted regarding water depletions and possible impacts to downstream TE species (see correspondence with G. Jordan in project record). The agency did not have any concerns with water depletions occurring on the Forest and the effect of that activity on pallid sturgeon. Additional information

can be found in the administrative record.

Aquatics Comment #6 Addressing non-point source sediment resulting from management activities should be given high priority for improving water quality.

We agree, and we believe that the strategies and standards and guidelines reflect this priority. The Revised Plan strategies recognize that maintaining water quality is the law under the Clean Water Act (CWA), and the incorporation of Watershed Conservation Practice Handbook measures in the Revised Plan provides the mechanism for projects to achieve the requirements of the CWA. No changes were made between draft and final as a result of this comment.

The commentor provided a long list of water quality related impacts, under the premise that the DEIS failed to assess and disclose those impacts and that additional monitoring efforts should focus on quantifying the impacts. The Forest recognizes the need to protect water quality and address non-point sources of sediment with the implementation of WCPH guidance and BMPs. Reduction of sediment loads is better addressed at the project level during site-specific project planning efforts.

Aquatics Comment #7 The Plan is deficient in its efforts for water quality monitoring. Additional standards should have been added to the plan to protect water quality, and additional monitoring should have been specified to track water quality.

Based on this comment, the ID team reviewed and made some revisions to Revised Plan Chapter 4, Monitoring and Evaluation. Monitoring Items 1, 5, 6, 8, 13, 19, 41, 44, and 45 monitor water quality, protection implementation, and effectiveness. We believe the water monitoring and evaluation is quite strong. The direction in the Revised Plan already incorporates the Clean Water Act and Watershed Conservation Practice Handbook direction.

Water quality monitoring was a common theme in many comments received. However, no specific recommendations for the water quality parameter(s) be monitored were provided. Some commentors also requested site-specific detailed analyses that are appropriate at the project scale but not at the Forestwide scale.

The Forest jointly assesses water quality conditions, including monitoring, with the Wyoming Department of Environmental Quality (WYDEQ). With the implementation of the Revised Plan, long-term monitoring stations will be established, and inferences about water quality will be based on the information gathered as a result of those efforts.

There are currently two streams on the Forest identified as having violated water quality standards, N. Tongue River and Granite Creek. The Forest has cooperated with WDEQ and other stakeholders to intensively monitor these streams as a result. Other intensive water quality monitoring efforts have been conducted in the past, across the Forest, and

COMMENTS AND RESPONSES

violations were not identified at that point in time (see the STORET database available at <http://www.epa.gov/storet>).

The Forest has also cooperated with non-governmental agencies, such as the Cloud Peak Chapter of Wilderness Watch, to collect additional baseline water quality data. Results of those sampling efforts have not identified water quality violations.

Aquatics Comment #8 The Forest should protect the water retaining properties of the landscape.

Regional Forest Service direction in FSH 2509.25 provides guidance for water retention through various watershed conservation practices.

Aquatics Comment #9 The Forest did not provide an adequate inventory of wetlands in the DEIS or Draft Plan.

Winters et al. 2004 was used for supporting information during DEIS and Revised Plan development. That document provides a detailed analysis of wetlands by type, by watershed for the entire Forest. The document was referenced numerous times in the DEIS/Revised Plan. In addition, the Forest has what is considered to be the best riparian map layer in the Region, and we have the NRCS wetland maps available. These documents are on file in the administrative record and are available for review upon request.

Biodiversity

***Biological Diversity Desired Future Conditions and Habitat Diversity for
Comment #1 forested acres: The plan did not contain adequate
direction to establish desired conditions for forested
vegetation.***

The Forest incorporated and revised the Desired Condition appendix from the DEIS and incorporated it within Chapters 1 and 3 of the Revised Plan.

***Biological Diversity Old Growth Conifer: Management direction for old
Comment #2 growth is inadequate; management direction for old
growth is excessive.***

Old growth direction was reviewed between draft and final and some small changes to Biodiversity guideline 4 were made between draft and final. The Forest has had experience implementing the 1985 Plan old growth guideline. This guideline has been under development since the ASQ amendment process in the early 1990s. So, considerable implementation experience went into the development of this guideline, in order to strike that balance between resource management and protection.

The Forest used research conducted in Yellowstone National Park to derive the amount of old growth timber to manage for on the Bighorn National Forest. Because the

application of this research was hypothetical to the Bighorn NF, management direction is a forestwide guideline, rather than a standard. However, the minimum amounts to manage for were retained as displayed in the DEIS and proposed plan, as this type of habitat is important to several sensitive species. Corrections to the forest-wide guideline were made based on public input, including the allowance for designating old growth stands to manage for, based on remotely sensed data, in the absence of a field inventory. Refer to Chapter 1 of the Revised Plan. This topic is also addressed in the FEIS under Biodiversity effects and in the Forested Structural Diversity document in the project record. Finally, implementation guidance is provided in Revised Plan Appendix A.

***Biological Diversity
Comment #3***

Riparian Management: The use of a 300' riparian buffer is unfounded.

A riparian buffer greater than 300' should have been applied as a standard.

These opposing comments refer to Biodiversity Guideline 9. Based on comments to the Draft Plan, the wording in the guideline was revised slightly, and the implementation direction in Revised Plan Appendix A was strengthened.

The Forest adopted this forestwide guideline to provide direction for habitat important to many species. Often, the forested area adjacent to a riparian area is of increased habitat value due to growth rates and moisture influenced habitat components. This particular habitat corridor is important for sensitive species such as the marten. The Forest retained this management direction as a guideline, and applied a coefficient to reduce the amount of suitable timber calculated to yield volume from the timber model for effects analysis purposes. Due to the uncertainties surrounding implementation of this direction, it was deemed unfit as a standard. Implementation guidance concerning this direction was clarified in Appendix A of the Revised Plan. In addition, this 300' zone was removed from the "suited base" within management prescriptions 5.4 when calculating potential yields with the timber model.

The administrative record includes a review of several research papers that support protection of habitat along riparian corridors, some of which suggest wider buffers. This width was selected based on the totality of the information in those studies.

***Biological Diversity
Comment #4***

Viability of Species: Management of viability for species can not be ensured without information regarding populations and distribution of those species, with additional monitoring occurring to ensure species viability.

Because of this comment, and recognition of the importance of this topic in past litigation and appeals, the Forest ID team thoroughly reviewed the entire administrative record on this subject. A variety of improvements to the analysis were made between draft and final.

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The Forest's approach to management for species viability was summarized in the Biodiversity effects analysis in the FEIS, and followed current national and regional direction. This approach included assessments of the landscape (terrestrial and aquatic ecosystem assessments), identification and assessments of emphasis species (TES, MIS, Local Concern, Demand) as displayed in Appendix C of the Revised Plan, and identification and management of threats to those ecosystems and species through alternative development (use of management category prescriptions) and management direction (objectives, strategies, standards and guidelines). These approaches were described in more detail in the project record documents as follows: the Viability Process, Summary of Ecological Assessments, Emphasis Species Selection, MIS Selection Process, National whitepaper on Viability, Region 2 Approach to Viability, Fragmentation whitepaper, Forested Structural Diversity whitepaper, Emphasis Species Assessments, Species of Local Concern assessments, Biological Evaluation, and the Biological Assessment. While detailed information on species populations, distributions, and habitat may be more desirable, the National Forests often do not possess or have access to this type of information and must operate based on the best available science, which this revision incorporated. Monitoring approaches were specified in Chapter 4 of the Revised Plan, based on considerations documented in the species assessments conducted.

Biological Diversity ***The 1985 Plan included Preacher Rock Bog as a 10C***
Comment #5 ***Special Interest Management Area. It, and other***
 important botanical areas, should be protected.

The Revised Plan protects biological diversity at the finer scale through the following: Biodiversity Guideline 7 specifically mentions Preacher Rock Bog and other important habitats.

Biodiversity Guideline 9 provides for stream-corridor habitat management.

The species of local concern list is much longer than current sensitive species or MIS lists.

Monitoring for individual species and habitats is ongoing, and is built into the monitoring chapter.

The small-scale management areas in the 1985 Plan were replaced with large-scale areas more in keeping with the scale of the disturbance events in the Bighorn National Forest ecosystems. Management Areas in the revised plan do not provide the protection resolution that would benefit fine scale resources such as individual species or unique habitats.

Communities

***Communities
Comment #1*** ***The DEIS does not provide sufficient information on the details of the financial and economic efficiency analyses.***

The discussion of financial and economic efficiency analyses was expanded and improved in the Communities section of the FEIS. In addition, FEIS Appendix B now contains more information on the details of these analyses. A complete set of details can be found in the administrative record.

***Communities
Comment #2*** ***The DEIS does not discuss the effects of forest management on long-term economic development, contraction, or growth of the area. In addition, the impacts need to be disclosed at the community level.***

Timber and recreation are the two variables in the planning process that most influence community economic impacts. Conversely, growth in the four-county area and in communities to the east and south will have a sizable effect on recreation use of the Bighorn NF. The FEIS now includes a more intensive analysis of these relationships.

The timber industry has been analyzed in great detail, providing insights at several scales. Firm, industry, community, and small regional effects have been examined and presented in the FEIS. These can be found in the Timber Resources and Communities section of FEIS Chapter 3. Some of the analysis results are quantitative; others are qualitative. Projections of the timber industry were not found nor made by the Bighorn. The industry fundamentally responds to market forces and conditions that change rapidly, are exceedingly complex, are well beyond the scope of this plan revision and the influence of this national forest. However, industry and economic impacts from changing timber harvest levels are presented in light of recent industry behavior.

Recreation use has been forecast over the next decade, using statistically reliable historical use, population growth projections from the state of Wyoming, and participation and growth rates for selected activities from Forest Service researchers. Several population growth scenarios were considered, with the highest level incorporated into the recreation analysis. The high-growth scenario was deemed most appropriate in consultation with the Wyoming Business Council. The future contribution of the Bighorn NF to the west-side and east-side economies is presented in the cumulative effects subsection of the Communities section in FEIS Chapter 3.

***Communities
Comment #3*** ***The DEIS does not discuss the difference in wage impacts between the timber and tourism industries.***

Income effects of each alternative are displayed in various tables in the Communities section of FEIS Chapter 3. Some tables separate the income effects by forest program, so that timber and tourism industries can be compared. These tables and associated narrative have been updated and revised for the FEIS. Job and income relationships specific to the timber industry in the northern Rockies were used in estimating the impacts of each alternative.

COMMENTS AND RESPONSES

**Communities
Comment #4** ***The DEIS does not discuss the viability of the timber industry, both as a whole and for individual firms.***

See response to Communities Comment #2. Viability of individual firms cannot be determined without access to confidential accounting records. Viability of the local timber industry is difficult to determine, but it does not appear to be contingent upon Bighorn NF timber, given the small proportion of total timber supply provided by the forest. Within the scenarios examined, timber industry production may be reduced by 10 percent or increased by 40 percent. Even at the highest production levels, mill operations are expected to remain at one-shift. This is discussed under *Anticipated Harvest* in the Timber Resources section of FEIS Chapter 3.

**Communities
Comment #5** ***The relationship between elk security and economic contributions was not analyzed or disclosed.***

See Planning Comment #1. Elk security did not alter projected use of the Bighorn NF by hunters for any alternative. Consequently, there were no changes in the economic contribution of the forest attributable to hunting.

**Communities
Comment #6** ***Impacts to the tourism industry were not adequately disclosed in the DEIS.***

The tourism industry is discussed in the Communities section of the FEIS Chapter 3. The contribution of Bighorn NF recreation to the economy is displayed and discussed. Impacts to tourism were only affected by changes in management of developed campgrounds, and those only occurred in Alternatives A and E. A variety of tables in the Communities section of FEIS Chapter 3 attribute this impact to the recreation program. Growth in overall tourism projected for the area far exceeds the magnitude of tourism impacts identified for these alternatives. Commentors cited concerns for a variety of motorized uses that might be affected by a given alternative. None of the alternatives affected motorized use levels. Wilderness designation was also cited by commentors as a contributor to local economies. Wilderness use is included in the total impact of the recreation program.

**Communities
Comment #7** ***The relationship between livestock grazing and economic contributions was not fully analyzed or disclosed.***

See Livestock Grazing Comments. The quantity of livestock grazing (either in terms of animal-unit-months or head-months) does not change among alternatives. Consequently, there is no economic or social effect. The livestock industry, its contribution to the economy, and the importance of Bighorn NF permittees both economically and socially are discussed in the Communities section of Chapter 3.

**Communities
Comment #8** ***The dependency of local communities and regional economies on the Bighorn NF has not been adequately analyzed.***

Dependency can be examined at a variety of scales and dimensions. However, the

analysis of dependency can only be done where available data – and quantitative economic data is only available at the county level. The smallest scale for which economic modeling makes is the east-west split of the 4-county area. Economic dependency of the east and west sides has been analyzed and displayed in the Communities section of FEIS Chapter 3. This is shown in two charts and discussed accordingly. The economic contribution of the Bighorn NF to each side of the forest is also provided. In addition, dependency of the timber industry is illustrated through the demand and supply analysis in the Timber Resources section of the FEIS. Dependency of grazing permittees on public lands is also presented in the Communities section. Social or cultural dependency cannot be treated quantitatively, so it has been discussed qualitatively. All of these analyses are revised and improved in the FEIS.

**Communities
Comment #9**

The DEIS does not adequately address below-cost forest programs. Specifically, the Bighorn is proposing increasing the timber program under the preferred alternative in the Draft Plan despite the fact that Forest Service costs exceed revenues. It is unclear how this timber program meets the NFMA criteria of maximizing net public benefits.

From a financial perspective, the Bighorn NF timber sale program costs exceed the stumpage revenues received, and is projected to do so under all alternatives. There are no resource programs on the Bighorn NF, including grazing, recreation, wildlife and fire, where revenues the government receives from users exceed the Forest Service cost of administering the program.

Concerning the timber sale program specifically, the forest ID team spent additional time analyzing the ‘costs’ versus the ‘revenues’ between the Draft EIS/Plan and the Final. This analysis is included in the project record. A few of the considerations were:

- ◆ Since the 2000 fire season, the Forest Service and the public have recognized the ‘non-financial’ benefits associated with fuels treatment harvest programs and increased fire prevention access gained through road construction.
- ◆ One of the public benefits recognized in the final plan decision is that some regions, such as Colorado, have lost the ‘timber industry tool’ because of the near absence of a timber program. The Forest Service loses *less* money by receiving some stumpage revenue, versus paying for forest vegetation treatments such as fuel reductions or wildlife habitat improvements. In addition, for many fuels treatments, timber harvest is a more precise tool that can be used in many areas where prescribed fire poses an unacceptable risk.
- ◆ The Final alternative has a suited timber base of approximately 190,000 acres, compared to the 1985 Forest Plan suited timber base of about 262,000 acres. Most of the areas dropped were the highest cost areas in terms of road building and low value timber. This decision will improve the financial efficiency of the Bighorn timber program.

COMMENTS AND RESPONSES

Concerning the net public benefit, the Record of Decision displays the Regional Forester's rationale. One of the most important points was that the Revision steering committee helped provide a context for the RF to decide which alternative maximized the net public benefit. By definition, net public benefit is not a strictly financial calculation, but also considers non-monetary costs and benefits of the alternative. The steering committee was able to help define some of the non-financial benefits to the communities in terms how the alternatives contributed to the community custom and culture. In addition, the state agencies were able to provide a resource perspective on how alternative D-FEIS contributes to agriculture, the fuels program, timber industry, and recreation, among other resource benefits.

***Communities
Comment #10 The DEIS does not provide any fiscal consequences to local governments.***

Revenues from sales, lodging, and property taxes to local governments are discussed in the Communities section of Chapter 3 of the FEIS. The strongest relationship between these and Bighorn NF management is through the recreation program. Because recreation use is expected to change either negligibly or not at all from levels forecasted for the future, tax revenues are also not expected to change materially.

***Communities
Comment #11 The DEIS does not provide a clear trade-off analysis, especially the use of present net value, in support of the preferred alternative.***

The 1982 implementing regulations for the National Forest Management Act specify that "net public benefits" be used as the controlling concept for selecting a forest plan alternative. "Net public benefits" embodies the notion that ecological, economic, and social consequences must all be considered. No single decision criterion or index is capable of capturing all these consequences and values. A wide variety of measures are used throughout the FEIS. Commentors most often cited present net value (PNV) as the most important index, but it is only one of many that must be considered. Additional text has been added in the economic efficiency discussion within the Communities section of FEIS Chapter 3 explaining PNV and how it is used in a trade-off analysis. Many commentors cited the concept of opportunity cost as a way understand the trade-offs in choosing a given alternative. The Record of Decision is where the reader will find a discussion of decision criteria, measures used for each criterion, and their role in the final selection of the alternative. The concept of opportunity cost was used in developing the rationale for the decision.

***Communities
Comment #12 The scale and scope of economic effects in the DEIS are sometimes unclear and other times inadequate.***

Economic consequences of each alternative are examined from an impact perspective and from an efficiency perspective. Both are required by regulation. Economic impacts are mostly the result of changing timber program levels associated with each alternative. Impacts include employment and income estimates at the local economy

level (east side/west side). This is the smallest scale at which quantitative data is available and can be modeled. Economic impacts also include timber industry effects, separating firms located in northern Wyoming from those in Montana. Northern Wyoming includes Park County as well as the immediate four-county area around the Bighorn NF. Industry effects were based upon reports or estimates of firm-level production and employment obtained from public sources. Community-level effects are disclosed narratively, because they are interpretations of quantitative analysis at the economy or industry level.

Economic efficiency analysis conducted by Federal agencies always takes a national perspective. Costs and benefits, using market and non-market priced values, are discounted over 50 years. There is no “local” benefit cost analysis in the FEIS. These analyses are now described more fully in Chapter 3 and Appendix B of the FEIS.

Social analyses also were conducted at different scales. A survey of four-county residents sought to discover local preferences for Bighorn NF management. Because the Bighorn NF is a “national” forest, preferences expressed by non-residents also must be considered. Information from the National Survey on Recreation and the Environment, conducted by FS researchers, was used to consider the values of stakeholders nation-wide. The two surveys were not mixed, but represent two distinct value sets obtained from populations at two different scales. Both were used in the FEIS and in the decision.

***Communities
Comment #13 The draft plan lacks economic and/or social indicators that can effectively monitor the consequences and relationship between the Bighorn NF and local communities.***

Several economic and social monitoring requirements are in the Revised Plan, specifically monitoring items 2, 4, and 27. These are qualitative, narrative measures, because we did not find quantitative ‘indicators’ that effectively measured the consequences and relationship between the Bighorn NF and local communities. The semi-annual monitoring meetings specified in Chapter 4, and collaboration on individual project planning and implementation, will provide the dialog between Forest and community personnel to make inferences and conclusions on how the Revised Plan direction and implementation is affecting local communities. This collaboration should provide effective, periodic measures for monitoring social and economic consequences throughout plan implementation.

***Communities
Comment #14 Several surveys were used by the Bighorn NF to understand stakeholder preferences, but the DEIS does not explain how the differing results were reconciled or used.***

The FEIS contains a substantially revised subsection addressing stakeholders, their preferences, and how survey data were used. This subsection is found in the Communities section of FEIS Chapter 3.

Fire

Fire Comment #1 Several comments were received favoring specific Appropriate Management Responses (AMR) to wildland fires over other AMR's. Some favored allowing natural fires to play their natural ecological role (prescription or wildland fire use) in wilderness and in areas unsuitable for timbering, while others opposed this strategy. Some comments were received requesting that direct control be the only AMR allowed in areas with suitable timber.

Comments on the Fire and Fuels section of the DEIS were considered when the AMR mapping process was conducted, as described below. The primary change between draft and final is that the draft plan included AMRs assigned by management area, regardless of actual location on the Forest. The AMR map included in the final started with the AMR by management area, but that was refined based on the factors listed below.

FEIS, Chapter 3, Fire and Fuels Management, describes the three appropriate management response (AMR) strategies allowed for the Bighorn National Forest and the process for determining the AMR. An appropriate management response (AMR) to wildfires will be designated for all areas of the Forest with burnable vegetation. The Forest's approach to designating AMRs for areas of the forest included considerations such as firefighter and public safety, values at risk, predominant weather patterns, management area guidance, and resource needs, among other factors, by Fire Management Officers and Assistant Fire Management Officers. AMRs were assigned and mapped by these fire professionals. The map was displayed for comment at several meetings and is included in Appendix A of the Revised Plan. The forest plan is the decision document for the AMRs and the Fire Management Plan is the implementation document.

Fire Comment #2 Forest Fires and Timber Management: A variety of comments were received favoring use of timber harvest and thinning to reduce the risk of wildfires. Other comments were opposed to these methods as viable ways to reduce wildfire risk.

These comments resulted in improvements to the analysis and effects display. As indicated by the above comments, there are both negative and positive aspects associated with timber harvest and thinning. FEIS, Chapter 3, Fire and Fuels Management, Direct and Indirect Effects, provides a complete discussion of this issue including both the positive and negative effects on fire/fuels that can be expected from timber harvest. Since most timber harvest requires increased road access, the issue of travel management (available road access to areas of the Forest) is very closely related to timber harvest and is discussed in the FEIS, Chapter 3. The predominant forest types on the Bighorn are lodgepole pine and spruce/fir. Fires in these ecosystems tend to be more of a product of weather and extended drought than of fuels accumulations or

treatments of them. The present mosaic of forest vegetation is a result of previous large scale disturbance events including insects and disease, wind, and wildfire. Large fires can be expected to occur under all alternatives as has been the case historically.

Fire Comment #3 The guidelines in Disturbance Processes, Fire, are too general. We request you provide specific acres of prescribed fire and what habitats will have priority.

These guidelines are not intended to provide project level specificity which is implied by this comment. The request for the exact location of treatments is site-specific, project-level planning which is beyond the scope of the Revised Plan. The FEIS Chapter 3, Environmental Consequences, Acres of Fuels Treatment, does describe the priority fire regimes for treatment and displays the number of acres estimated to be treated under each alternative.

Fire Comment #4 One commenter disagreed with Forest's method for modeling Fire Hazard, Fire Risk, and Acres Burned by Wildfire.

The Forest utilized the FLAMMAP program to model fire hazard trends, PROBACRE to model or estimate the number of acres that may burn by wildfire over the next 10 years, and conducted a Fire Risk Analysis to rate the fire risk for areas of the Forest. All inputs for these programs and analyses were consistent with requirements and procedures for the programs. The procedures are described in FEIS, Chapter 3, Fire and Fuels Management, and in FEIS, Appendix B, Analysis Process. The Forest originally used the years 1970 through 1996 for fire occurrence, however, in response to a commenter request incorporated the most recent fire occurrence statistics through 2004 (to include recent drought years and population changes) for use in PROBACRE and the Fire Risk analysis. In summary, large fires have historically occurred, and would continue to occur into the future, largely regardless of management actions taken by the Forest. After careful review by Forest and Regional fire management specialists, it was determined that the approach used in the DEIS, with minor corrections and data improvements, was the proper analysis approach to be used at the programmatic, forest plan scale.

Fisheries

Fisheries Comment #1 The Forest needs to change fishing regulations.

This comment is outside the scope of forest plan revision. The Wyoming Game & Fish Department is the responsible agency for the development, regulation, and enforcement of fishing regulations.

Fisheries Comment #2 There are no standards for fisheries resources.

Standards for fisheries were developed between the Draft and Final Plan. See Fisheries section in Final Plan.

COMMENTS AND RESPONSES

Fisheries Comment #3 Yellowstone cutthroat trout should receive more consideration in the Final Plan.

More detailed comments associated with this rather broad summary comment shown here provided good recommendations for reevaluating Yellowstone cutthroat trout streams on the Forest and protection measures were incorporated with the development of Management Areas 5.4, around some existing populations.

Fisheries Comment #4 Yellowstone cutthroat trout, amphibians, mountain sucker, and pallid sturgeon: These species should have been an MIS, with more stringent management direction applied to their habitat. Downstream effects and water depletion standards should have been incorporated to protect sturgeon.

The above mentioned species were considered for use as MIS; however, other species were selected to better represent the management issues and potential habitat and population interactions on the Forest. For a summary of the MIS selection process, refer to Appendix C of the Revised Plan. Additional information is contained in the MIS Selection Process document on file in the administrative record.

Management direction for aquatic habitat was vastly improved over the 1985 Plan with the incorporation of the Watershed Conservation Practices Handbook as management direction, and other standards and guidelines described in the Forestwide Direction portion of the Revised Plan Chapter 1. Specifically refer to the Soil and Riparian section, and the Fisheries section under physical and biological resources, respectively in that chapter.

Any potential dewatering or habitat issues that could impact downstream populations of the pallid sturgeon would need site-specific NEPA and consultation with the U.S. Fish and Wildlife Service. The U.S. Fish and Wildlife Service concurred with the Forest's determination that the Revised Plan would have no effect on the pallid sturgeon.

Forest Vegetation

Forest Vegetation Comment #1 There is a concern about the benefits and costs of offering timber sales.

Between Draft and Final, the Forest ID team considered an 'above-cost' timber sale alternative, but because of the reasons shown in FEIS Chapter 2, it was not analyzed in detail.

Through timber sales, the Forest Service achieves numerous goals, such as fuels reduction, habitat diversity, and offering timber for national consumption to local mills. These sales provide a variety of benefits, not all of which are monetarily valued. Some sales return more dollars to the government than they cost to implement, while others

may be a financial nest cost. Timber harvest is often a cost-effective means to achieve forested vegetation goals that are not priced in the marketplace. The range of alternatives displays varying levels of timber sale offerings and their effects.

***Forest Vegetation
Comment #2***

There are concerns about the roads associated with timber sales, the amount, their design, cost, and closure.

Based on this comment and others like it, the short-duration road strategy was developed between draft and final. It was created to balance the ‘need and benefits’ of the road against the costs. In addition, Infrastructure – Travelways Standard 1 was rewritten between draft and final to clarify travelway management.

Roads are required to remove timber from the Forest. Through goals, objectives, strategies, standards and guidelines, the Revised Plan provides direction to minimize the impacts and costs of roads associated with timber sales. The amount of road building varies by alternative providing a range of estimated road construction. Road location, construction, and closures are site-specific decisions not forest plan scale decisions. The timber model used in determining Allowable Sale Quantity (ASQ) utilized costs and benefits of timber sales, including road cost in scheduling harvests.

***Forest Vegetation
Comment #3***

There are concerns about the effects of logging on other resources such as water, soil, and wildlife.

Implementation of Best Management Practices (BMPs) for timber, included by reference in this Revised Plan, has been shown to eliminate adverse effects of logging on water and soil resources. The Revised Plan also includes goals, objectives, strategies, standards, and guidelines to protect water, soil, and wildlife resources and to enhance wildlife habitat and the recreational experience of hunting wildlife.

***Forest Vegetation
Comment #4***

There are concerns over the size of created opening. Are they large enough or too large?

The exact size of created opening though timber harvest is a site-specific decision. The Revised Plan contains guidance for planned opening greater than 40 acres. All alternatives allow for a variety of created opening sizes to emulate the natural scale and intensity of disturbance events.

***Forest Vegetation
Comment #5***

There is interest in the economic affects of timber harvest to economies, local, regional, and national.

There was a substantial improvement between draft and final in the timber supply and demand analysis. The analysis examined recent production, capacities, and supply sources of the local timber industry and individual timber purchasers who have purchased Bighorn timber within the last decade. The economic affects of various timber program levels are displayed in the FEIS and address local and regional scales, and were updated between draft and final. The final analysis also recognized the international scale of the current timber industry.

COMMENTS AND RESPONSES

***Forest Vegetation
Comment #6***

The Allowable Sale Quantity (ASQ) should be sustainable.

This is true for all alternatives. Allowable Sale Quantity was calculated with a constraint that it be sustainable in the long-term, and to provide an even flow of wood fiber. See FEIS Appendix B for a discussion of ASQ calculations and assumptions.

***Forest Vegetation
Comment #7***

How was suited timber designated?

A full description is included in Appendix B of the FEIS. The first step is the identification of lands tentatively suitable for timber production. This analysis used a dichotomous key that was developed for the Bighorn in response to litigation in the early 1990s. The most current inventories and geographic information systems (GIS) techniques were used.

The second step was to identify areas where timber production met the objectives of each of the alternatives. A full array of suited lands was analyzed in the range of alternatives.

***Forest Vegetation
Comment #8***

When and where are harvests for other resource objectives from non-suited lands going to take place?

The Revised Plan includes goals, objectives, strategies, standards, and guidelines that identify where commercial timber harvest for other resource objectives may take place. For example, fuel reduction, wildlife habitat improvements, and increasing forest diversity are identified as appropriate objectives. The FEIS displays, by alternative, an estimate of the amount of management activity that would take place on these non-suited lands and how much wood fiber may be offered for sale. However, the location and timing of specific timber harvest activities are project-level decisions.

***Forest Vegetation
Comment #9***

The ASQ needs to be realistic, with budget, and Products-Other-Than-Logs (POL) amounts clearly defined.

Allowable Sale Quantity (ASQ) is the amount of sustainable wood fiber that could be removed, given the model constraints developed from the Forest Plan alternatives. Forest budgets were not a model constraint and the reality is that the Forest has not had the funding to offer the full ASQ volume for some time.

Total Sale Program Quantity (TSPQ) was developed in the FEIS to estimate a more realistic amount of acres treated and volume offered than in the DEIS, taking into account the affect of anticipated budgets on timber sale offering. Included in the TSPQ is a mix of sale offerings from sawtimber, Products Other than Logs (POL), fuelwood, and estimated volume harvested for other resource objectives from lands not suited for timber production. Total Sale Program Quantity is defined and displayed in the FEIS for each alternative analyzed in detail.

***Forest Vegetation
Comment #10***

Which management areas should contain suited timber?

Based upon recent Region 2 revision protocol, the ID team decided that management areas in Category 5 should contain suited lands. Management Area 5.41, wildlife winter range, doesn't contain suited lands as the emphasis in these areas is for critical wildlife winter range. This protocol did not change between draft and final.

***Forest Vegetation
Comment #11***

Lower levels of harvest will lead to higher risk of insects, disease, and wildfire.

The alternatives in the FEIS provide a range of management area allocations that provide a mix of natural processes and more actively managed lands. As displayed in the FEIS, those alternatives with more management areas that emphasize natural processes would have higher risk of disturbance processes including insects, disease, and wildfire.

***Forest Vegetation
Comment #12***

Utilize spatial analysis in determination of ASQ.

Spatial analysis was used to determine Allowable Sale Quantity. It is described in Appendix B of the FEIS and the administrative record.

***Forest Vegetation
Comment #13***

Timber suitability and modeling. There were concerns with how economics was applied in the timber suitability analysis and timber model.

Appendix B of the FEIS contains the analysis process discussion for timber suitability and modeling, further descriptions are included in the project record. In this suitability analysis lands that utilized unconventional harvest systems were removed in stage II of the process, while previous analysis waited to remove them by alternative. In addition, no commercial economic screen was applied, given the unpredictable tides of future economic and market conditions.

For timber modeling the overall objective of the model was to maximize present net value, and the model utilized recent costs and benefits to determine that. Because of the unpredictable future markets, the only economic screen applied was for road costs to be no more than 125% of the revenue for that period.

***Forest Vegetation
Comment #14***

Commercial timber harvest should be used as a tool to help control insects, disease, and wildfire.

Timber harvest is often used to increase resilience to natural processes such as insects, disease, and wildfire through increased diversity of age and size classes. The alternatives in the FEIS provide a range of management area allocations that provide a mix of natural processes and more actively managed lands. Those alternatives with more management areas that emphasize active management (category 5 management areas) would see timber harvest used more in control of insects, disease, and wildfire.

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**Forest Vegetation
Comment #15**

The Desired future condition needs to be more fully developed and integrated in the Revised Plan and not an appendix to the EIS.

Desired Future Condition (DFC) has been expanded in the FEIS and moved from an EIS appendix to Chapters 1 and 2 of the Revised Plan. There is now more developed DFC guidance for Alternative D-FEIS.

**Forest Vegetation
Comment #16**

Timber model. Explain how the constraints affect outputs. Which is most limiting? Show effects to the timber outputs from other resource standards and guidelines.

No sensitivity analysis to answer this question was performed for the Draft Plan. However, a sensitivity analysis, which included calculation of a 'base' (legal constraints only) level of production, was conducted for the FEIS. The sensitivity analysis isolated individual standard and guideline constraints and calculated the timber output 'cost' of each constraint.

Appendix B of the FEIS contains the analysis process discussion. A sensitivity analysis was performed on what was thought to be the most constraining items in the timber model. Most constraints are compensating, and individually, there was little difference. Model objectives had the most effect on the volume of ASQ. Long-term sustained yield was the most limiting. The results of the sensitivity analysis are included in the administrative record.

**Forest Vegetation
Comment #17**

The Woodstock/Stanley timber model is not a valid model for doing Forest Plan ASQ analysis. Spectrum should be the model used. The Black Hills was using this model and abandoned it in their amendment process.

This comment resulted in an extensive review of the timber modeling analysis. Regional and Washington Office analysts reviewed the Bighorn model and whether or not Woodstock/Stanley (W/S) was an appropriate tool. The reviewers found that W/S is adequate; the algorithms, formulas, logic paths were very similar to, if not the same as, Spectrum, with the added advantage of having the spatially explicit Stanley GIS tool. Their recommendation was to continue using it. Concerning the assertion that the Black Hills abandoned use of W/S, the Bighorn ID team members spoke to the Black Hills analyst and found that the Forest abandoned revising the ASQ altogether in their amendment process. Therefore, they abandoned the need for any type of timber modeling tool.

The model the Bighorn constructed and used in W/S was rebuilt for the final EIS/Plan to incorporate the following specific improvement suggestions from the Washington Office and Regional Office reviewers:

- ◆ Sensitivity analysis.
- ◆ Change from a goal programming solution to a linear programming solution.
- ◆ Suggestions on how to simplify the road cost analysis.
- ◆ Other suggestions on how to model the constraints more appropriately.

***Forest Vegetation
Comment #18***

There is inconsistent emphasis on the value of aspen stands, and the projected outputs to maintain those stands.

Based on this and other comments, the number of acres treated in the Final Plan strategy was increased to 50 acres annually, as opposed to the 20 acres treated annually in the Draft Plan strategy. The original lower number was based on budget concerns and the small size of Bighorn National Forest aspen stands that make this work quite expensive.

***Forest Vegetation
Comment #19***

What is the growth and mortality on the Bighorn Forest?

Growth and mortality can be calculated a number of ways. For all the forested lands and species on the Forest, including wilderness, RNAs, steep, and suited lands the Forest Inventory and Analysis (FIA) data shows an average net annual growth of 212,554 CCF and annual mortality of 143,862 CCF.

To estimate the growth and mortality on lands that could be suited for timber production; we used the sensitivity analysis run for maximum timber yield. This utilized the suited acres in alternative E which include roughly 95% of all tentatively suited lands. Growth for the first period was 54,407 CCF annually from suited species, mortality was calculated at 34,546 CCF annually.

***Forest Vegetation
Comment #20***

The desired future condition of the forest should show more early structural stages and fewer intermediate and late.

The desired future condition (DFC) based on habitat structural stage groups of early, intermediate and mature is included in chapter 1 of the Forest Plan. The stages shown were developed in a interdisciplinary approach, considering not only habitat diversity goals, but other resources such as scenery and wildlife. These were reviewed by Forest and Regional teams and the Forest Plan Steering committee. While they may not represent the ideal for a single resource, they do represent a intergrated goal.

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Forest Vegetation Comment #21

How much forested land is affected/included in the 100' to 300' buffer zone?

Displayed below is the calculated acres in the 100-300' riparian habitat zone for all forested lands, for tentatively suited lands, and for suited in alternative D-FEIS.

Cover type	Acres Forested area	Acres Tentatively Suited	Acres Suited in Alt. D-FEIS
Spruce/fir	18,966	6,087	2,899
Douglas fir	6,883	1,073	627
Lodgepole pine	32,154	19,259	7,297
Ponderosa pine	1,568	0	0
Limber pine	889	0	0
Juniper	170	0	0
Aspen	1,271	0	0
Cottonwood	133	0	0
Total	62,034	26,419	10,823

Heritage Resources

Heritage Resources Comment #1

“Extensive protection is urged for the Medicine Wheel Historic Landmark. The Final Plan should encompass the 18,000 acres of the "area of consultation" of the Medicine Mountain and Medicine Wheel”.

This comment did not result in changes to the Draft Plan. There is a difference between the National Historic Landmark (NHL) and the Revised Plan management area. The NHL is currently 110 acres, and there is a separate, ongoing planning process that may result in an expanded NHL boundary. This eventual decision will be incorporated into the Revised Plan, as appropriate, using the amendment process. The Revised Plan management area boundary and direction reflects the boundaries and direction in the Historic Preservation Plan. The Management Area is 20,863 acres under Alternative D-FEIS, using the best technology to approximate the HPP boundary.

**Heritage Resources
Comment #2**

“The Tribe is very supportive of Alternatives B, C, D, and E which incorporate provisions of the Medicine Wheel/Medicine Mountain Historic Preservation Plan (HPP) into the Forest plan as a Special Interest Area. Adoption of any alternative that would weaken its protection or reduce the size of the consultation area would threaten the great progress that has been made to protect this sacred place.”

“...moving the area surrounding the Medicine Wheel into a special management area and increasing the area from less than 100 acres to over 20,00 acres shuts off access to the bighorn mountains to great extent.”

These comments reflect some of the divergent comments received on the Medicine Wheel Management Area. While there was some changes to the Medicine Wheel direction in the final Revised Plan (see Heritage Resources Comment #3), most of the direction for management of this area remained the same between draft and final, reflecting the HPP.

**Heritage Resources
Comment #3**

Based on the description of land management categories in the draft documents, it would seem that either Category 2 or Category 3 could be appropriate for the HPP area. Categories 4, 5, and 8, as currently described, do not seem to capture the current management prerogatives for the area. Thus, we would be opposed to a reclassification of this area to a higher category such as Category 8.

This comment resulted in a change between the draft and final Revised Plan. The management area ‘designator’ for the HPP area was changed from 3.1 to MW, because the Forest Service believes the management area continuum of 1 to 8 does not adequately reflect the unique direction contained in the HPP. In addition, the specific standard and guideline direction and desired condition discussion in the draft Revised Plan were dropped from the final Revised Plan, because the precise direction in the HPP, as amended into the 1985 Forest Plan, was the direction desired for this area. The final Revised Plan simply incorporates the amended 1985 Forest Plan direction. The HPP was developed, and has been implemented, by the consulting parties over nearly a decade, and it was the intent of the final Revised Plan to adopt that process and direction.

**Heritage Resources
Comment #4**

“Don’t allow logging in the area of Medicine Mountain.”
“Lands in MA 3.1 that were suited in 1985 should continue to be suited.”

These comments reflect differences in opinion as to how the Medicine Wheel area should be managed, and resulted in changes between the draft and final Revised Plan.

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The draft Revised Plan did not include suited lands in Management Area 3.1. However, the intent of the final Revised Plan direction was to fully reflect the HPP as it was amended into the 1985 Forest Plan. Therefore, the lands identified as suited for timber production under the 1985 Plan, as amended by the HPP, are identified as suited in the final Revised Plan. Subsequent site-specific planning will determine if, where, and how logging will occur in the MW management area.

Heritage Resources ***“...should utilize Indian people for interpretation of***
Comment #5 ***Medicine Wheel and Medicine Lodge (provide jobs)”***

This is an administrative issue and outside of the scope of forest plan revision. However, the Forest has attempted to hire American Indians as interpreters at the Medicine Wheel. Medicine Lodge is a State Historic Site, and is not part of the National Forest System.

Heritage Resources ***“Please incorporate the MA 2.1 Elephant's Foot acres from***
Comment #6 ***Plan B into Plan D. It would be irresponsible not to protect***
 an important archaeological site.”
 “We recommend designation of Buck Creek as a Special
 Interest Area.”

While Elephant's Foot and Buck Creek were designated as 2.1 Management Areas in Alternative B of the draft Revised Plan, these designations did not carry into the final Revised Plan. Heritage Resources Guideline 5 incorporates the Historic District map (into the Revised Plan Appendix A with the following language:

“To ensure proper resource protection and to ensure that proper procedures are conducted, refer to the map of Historic Districts in Plan Appendix A during site-specific project planning (36 CFR 800).”

Both Elephant's Foot and Buck Creek, along with six other historic districts, are identified on the map in Revised Plan Appendix A. These areas were considered by heritage resource specialists to be “...the best of the best” representation of historic/cultural resources on the Bighorn National Forest. By identifying districts, the larger context of these resources can be protected and managed for under the heritage resource laws, as opposed to managing for individual, scattered, sites. The intent is that landscape-level historic district plans will be completed for each of the eight identified districts. For the final Revised Plan, it was decided that historic district identification, and management under the heritage resource laws, regulations and policies, was more appropriate for Elephant's Foot and Buck Creek than were management areas.

***Heritage Resources
Comment #7***

“The Forest Service has reneged on its commitments made in 1996 and 1997 by proposing to establish management area 3.1 Special Interest Area (Medicine Wheel) to include 20,863 acres in all alternatives. Clearly this is a change from the No Action Alternative as demonstrated by 61 acres in Alternative A. We recommend that the acreage in MA 3.1 be limited to 61 acres per the 1985 Forest Plan (DEIS Alt A)”

This comment did not result in a change between the draft and final Revised Plan. The management area boundary was expanded for the Revised Plan to reflect the entire HPP boundary. The entire HPP area has been managed under the HPP since Forest Plan amendment number 12 in 1996, and the MW management area designation is a better reflection of the HPP direction. This is an appropriate change to make at the time of revision.

***Heritage Resources
Comment #8***

“Display HPP's standards and guidelines in the Revised Plan.”

While some of the HPP standards and guidelines were displayed in the draft plan, they were removed from the Revised Plan, which simply cites the HPP, along with the applicable 1985 Forest Plan direction that carried forward under forest plan amendment 12 (forestwide goals and objectives, for example). By carrying forth the HPP and other amended 1985 Plan direction, the chance of ‘reinterpretation’ caused by inaccurate or incomplete wording in the Revised Plan is reduced.

***Heritage Resources
Comment #9***

“The Medicine Wheel HPP management area can not be put in a 10c or 3.1 management area, that would put it in conflict with HPP management plan page 23 which states “when a new HPP boundary has been designated, the forest plan will be amended to reflect the boundary as a special interest area, similar to forest plan prescription 10c.”

The boundary of the MW Management Area is the same as Management Area 3.1 in the draft Revised Plan, both of which were our best mapping approximation of the HPP boundary. If the HPP boundary is revised, through the consultation process, an appropriate forest plan amendment would be completed.

***Heritage Resources
Comment #10***

“...We recommend protection of all sacred and cultural sites and that the Forest work in consultation with Tribal Elders/Representatives on this process.”

We agree that all cultural and archeological sites need to be managed and protected, according to historic preservation laws, regulation, and policy. The historic district list in Revised Plan Appendix A indicates the priority areas on the Bighorn National Forest. We agree with your comments regarding consultation - this is a legally mandated

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process which will continue to occur in the future. The annual Medicine Wheel HPP consultation meeting is an important step in the consultation process, and other meetings are held as appropriate.

Insects and Disease

Insects and Disease Comment #1 ***Commercial and non-commercial treatments should be used as tools to help control insect infestations on the Forest.***

See forest vegetation comment #14.

Insects and Disease Comment #2 ***The Forest should use timber harvest to salvage trees killed by insects/disease.***

The ability to salvage wood fiber is a site-specific decision, however the Revised Plan includes direction for which management area allow for salvage.

Lands

Lands Comment #1 ***The Forest should adopt a guideline that will identify USFS lands or roads on both side of a fence or gate.***

Real Estate – Rights-of-Way Guideline 3 (Revised Plan, Chapter 1) was added based on this comment. It states "Where needed, post signs indicating the location of landlines and the National Forest boundary."

Livestock Grazing

Livestock Grazing Comment #1 ***Alternatives Considered and Effects Analysis: Alternatives that allowed for different levels of livestock grazing were not included. Effects from livestock grazing impacts on riparian areas and other habitats were not adequately displayed.***

The Forest considered additional alternatives, including varied livestock levels, as documented in Chapter 2 of the FEIS under Alternatives Considered but Not Analyzed in Detail. Stocking levels are a site-specific decision addressed through project-level NEPA. The Forest Plan decisions on desired future conditions, standards and guidelines, and monitoring protocols will be implemented through the site-specific Allotment Management Plans.

Improvement of the management direction for livestock (strategies, standards and guidelines) occurred with this revision. Effects of livestock grazing are displayed in the aquatics and livestock grazing sections of Chapter 3 of the FEIS, in addition to the

species viability considerations mentioned under the Biodiversity comments above. A suitability analysis was conducted for the Revised Plan, as documented in the project record and summarized in the FEIS. The range suitability analysis was reviewed and revised for the FEIS.

***Livestock Grazing
Comment #2***

There is a concern that overgrazing by permitted livestock occurs and that administration of grazing permits is inadequate, resulting in negative impacts to the resource.

This is a permit administration issue, not an issue that the Forest Plan can resolve. If the Revised Plan standards and guidelines, as interpreted and applied in the annual operating plans and allotment management plans, are applied and administered properly, overgrazing will be addressed and will not occur in subsequent years.

Term grazing permits and bills for collection authorize most livestock use on the Forest. Forest plan direction and standards and guidelines describe desired conditions, resource sideboards (limitations), and monitoring for livestock use at the Forest level. The AMP provides these at the site-specific level, responds to site-specific issues, and addresses monitoring. It directs management to work toward maintaining or achieving a defined desired condition. Guidance is provided for administration of terms and conditions of permits through manual and handbook direction. This includes policy for managers to use in addressing instances of non-compliance with term permits. It also includes authority and flexibility to authorize annual livestock use in numbers or time (AUMs) different than that listed on part 1 of term grazing permits, if conditions warrant.

***Livestock Grazing
Comment #3***

Some commentors questioned the strategy of supporting a set number of AUMs, some supported it, and some expressed support of current livestock use.

Livestock grazing is an important, but sometimes controversial use, on the Bighorn NF. On one hand, National Forest livestock grazing has strong historical roots and helps maintain rural open spaces by supporting working ranches. On the other hand, there are people who commented that livestock grazing should not be allowed on the Bighorn NF.

The objective in question was revised considerably between draft and final. Objective 2C, Strategy #1 attempted to strike the proper balance. The Revised Plan version states, "Provide forage for livestock while managing to meet desired conditions. Provide forage for livestock at a level that strives to maintain or exceed the year 2004 permitted stocking level of 113,800 AUMs, while recognizing that stocking levels may be adjusted through the implementation of allotment management plans and administration of grazing permits". It does not guarantee that this number of AUMs will be permitted under the term grazing permit process in any given year.

Our current process for authorizing grazing through term permit includes flexibility to adjust AUMs authorized on an annual basis. AUMs permitted are the output after we implement the LRMP and AMP. Ultimately, resource potential along with results of

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management on the ground will determine the level of permitted AUMs. Output per allotment could go up or down. Our analysis indicates that total AUMs permitted on the Bighorn National Forest is likely to continue to decline until a sustainable stocking level is achieved on all allotments. The resource is able to support a limited livestock number and time of use under given management for a desired condition.

Livestock Grazing ***The suitability analysis was not adequate.***
Comment #4

The rangeland suitability analysis was reviewed, and some corrections were made as a result of comments received. Rationale for decisions regarding attributes of capable and non-capable landscape features is included in the administrative record, and a summary of the suitability analysis process is included in FEIS Appendix B.

Livestock Grazing ***The effects analysis was not adequate.***
Comment #5

The effects analysis was reviewed, and some corrections were made as a result of comments received.

Livestock Grazing ***Grazing fees should be adjusted.***
Comment #6

The establishment and adjustment of grazing fees are outside the scope of this analysis. Congress sets grazing fees on public lands.

Oil and Gas and Minerals

Oil and Gas and Minerals ***The Forest should allow mineral recovery in all management areas.***
Comment #1

Allowable mineral activities are regulated by law. The Revised Plan allows for those activities in management areas other than wilderness. Mineral recovery may not be allowable in site-specific areas such as administrative areas, campgrounds, reservoirs, etc.

Oil and Gas and Minerals ***There is concern about the impacts from oil & gas exploration as well as from locatable mineral activities.***
Comment #2

Please see the discussion in the Final EIS for minerals and also the demand assessment for oil and gas. The Forest is not a high production area for these types of resources and effects from management activities are expected to be minimal or non-existent. There are plan sections with standards and guidelines for various types of minerals.

Because of low potential for oil and gas resources on the Bighorn NF, the BLM report on likely development concludes that there is no reasonably foreseeable oil and gas activity expected on the Bighorn NF. Should someone propose drilling activity, a site-

specific EA or EIS would be done. The Revised Plan includes occupancy and timing stipulations that are designed to protect the resources. These are listed in Plan Appendix B. This appendix was updated significantly between draft and final because the stipulations were inappropriately tied to management areas instead of to resources, the stipulations were developed forest-wide instead of just where there is oil and gas potential, and the stipulations were not mapped by resource. These corrections were made for the Revised Plan and Final EIS.

Planning Process

Planning *The range of alternatives is not adequate.*
Comment #1 *There is no variance between the alternatives on elk security.*
 There should be other alternatives that provide more land to be recommended for Wilderness.

Between draft and final, the ID team assessed additional ideas for alternatives, especially based upon comments received on the Draft EIS. Alternative D-FEIS was improved based upon Draft EIS/Plan comments. In addition, several other ideas were considered as ‘stand alone’ alternatives or as modifications to the alternatives considered in detail. Those are listed as “alternatives considered but not analyzed in detail” in FEIS Chapter 2.

CEQ Regulation 40 CFR 1502.13(a) directs agencies to “rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated.” Through interdisciplinary teamwork and extensive public involvement, the Forest Service developed a range of 29 alternatives, 7 of which were analyzed in detail. All alternatives are described in detail in FEIS, Chapter 2. Reasons for not fully analyzing alternatives that were eliminated from detailed study are also presented in FEIS, Chapter 2.

The interdisciplinary team felt that elk security was a fundamental design criteria that should be included in all alternatives. Elk security is at least the ‘3rd generation’ of elk guidance for the Bighorn NF, developed cooperatively over time with the Wyoming Game and Fish Department, with its roots in the original 1985 Forest Plan guideline for hiding cover.

In the Draft Revised Plan, proposed wilderness was a part of three alternatives, including Alternative C. In the final, proposed wilderness was included in Alternative D-FEIS (see following table).

Alternative	Detailed Analysis?	Number of Areas	Acres
A, B, D-DEIS, E	Yes	0	0
D-FEIS	Yes	1	33,857
C	Yes	5	125,569

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Alternative	Detailed Analysis?	Number of Areas	Acres
All Capable and Available Recommended	No	8	About 165,000
Citizen's Alternative	No	8	About 433,000

Alternatives in a forest plan revision must provide for a broad range of reasonable management scenarios for the various uses of the forest (36 CFR 219.12(f)). A primary goal in formulating alternatives is to identify the alternative that comes closest to maximizing net public benefit. Thus, the evaluation of the range of alternatives does not focus on a single factor or forest activity (e.g., wilderness) but must consider the alternative as a whole.

Planning Comment #2 *It was wrong for USFS to publicly announce their preferred alternative in the Draft Plan and Draft EIS.*

The Forest Service identifies its preferred alternative (as outlined in CEQ regulations 1502.14) so that the public can understand the agency's orientation in the process. According to CEQ, "The 'agency's preferred alternative' is the alternative which the agency believes would fulfill its statutory mission and responsibilities, giving consideration to economic, environmental, technical and other factors."

Planning Comment #3 *"A True "No Action" Alternative: ...there is no evaluation of the other type of No Action [Alternative], for instance allowing no logging or mineral development on the Forest" (WWA, p.144)*

Constructing an alternative based on no management at all would be an academic exercise without analytical or decision-oriented utility. The "No Action" Alternative may be thought of in terms of continuing with the present course of action until that action is changed. Consequently, projected impacts of alternative management schemes would be compared in the EIS to those impacts projected for the existing plan. (Section 1502.14(d)) Several variations on the no-resource use theme were considered in the Alternatives Considered But Not Analyzed in Detail.

Planning Comment #4 *Due to inadequacies in alternatives and analysis, the Forest needs to prepare and disclose a revised supplemental EIS and Draft Forest Plan. Deficiencies in roadless inventory procedure and range of alternatives in DEIS are so severe that SEIS is needed.*

In his October 26, 2004 letter, the Regional Forester letter stated that the range of alternatives was adequate. The Regional Forester reviewed the issues raised in this comment. There is no need for a supplemental DEIS for the following reasons:

- ♦ The alternatives analyzed in detail were refined.
- ♦ The ID Team considered additional alternatives not analyzed in detail.
- ♦ Alternative D-FEIS incorporates at least some of commentator's concerns.

The new roadless inventory conducted between draft and final negated the need for a supplemental Draft EIS on the roadless issue. The DEIS roadless inventory included 377,471 acres, while the FEIS roadless inventory identified 494,790 acres that met the FSH 1909.12 definition of inventoried roadless. The primary difference between the two inventories was that roadless boundaries were ‘moved’ in the DEIS inventory to manageable boundaries, whereas in the 2005 inventory the manageable boundary step is later in the process. The range of alternatives is more fully addressed in responses to Planning Comments 1 and 3.

Planning ***"Objective" as defined in the Draft Plan does not match the***
Comment #5 ***definition in planning regulations 36 CFR 219.***

The definition of an objective was changed to meet the 36 CFR 219 definition. However, page 1-1 of the Revised Plan states, “The objectives listed in the Revised Plan were derived from the objectives in the 2000 Forest Service Strategic Plan and do not met the CFR definition of objectives as they are not time-specific or measurable.”

Planning ***There were many specific suggestions for Management Area***
Comment #6 ***changes. Two examples are: “5.11 (Moraine Creek-Willet Creek*
 drainages, Upper Trapper Creek, Medicine Lodge Creek, Sheep
 Creek-Trout Creek) should be 1.32.” and “There should be quiet,
 winter, non-motorized areas that are easily accessible from the
 highways.”**

To encourage people to make specific suggestions for improvements, the preferred alternative for the Draft Plan, Alternative D, was presented to the public during the comment period as “a template from which changes would be made for the Final Plan.” The ID Team reviewed all the suggested changes made in the DEIS comments. The ID team also received suggestions from the cooperating agencies. The state agencies, particularly the Wyoming Game and Fish Department, State Forestry, and State Trails made substantive suggestions. These suggested changes were discussed and debated over several meetings, were presented to the Steering Committee for discussion, and were recommended by the Forest Supervisor to the Regional Forester for selection. The entire suite of changes suggested during the Draft Plan/EIS comment period was used to improve alternative D, which became Alternative D-FEIS and was selected as the Revised Plan.

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Planning Comment #7 ***The Draft Forest Plan's monitoring strategy is inadequate in its prescribed timeframe and frequency and its ability to be implemented and enforced. The Revised Draft Plan does not contain an adequate monitoring plan according to NFMA planning regulations. Specifically, the monitoring plan: (1) is vague due to its use of Potential Monitoring Items; (2) lacks monitoring items for snag, down woody debris, old growth forest, riparian habitat and watershed quality and protection; and (3) contains monitoring intervals for fish, plant, and wildlife that are unacceptable.***

Potential monitoring items are thought to be the best means for answering the Monitoring Questions and fulfilling the Monitoring Drivers, given our knowledge today. They are designed to be adaptive – to allow the Forest to incorporate new information, methodologies, measurement techniques so the potential monitoring items may best answer the monitoring questions as the monitoring strategy is implemented over time.

Specific monitoring items for snags, downed woody debris, old growth forest, riparian habitat and watershed quality and protection are listed in the Monitoring Strategy table as follows:

- ◆ Snags – Monitoring item #45.
- ◆ Woody Debris – Monitoring items #18, #20, and #47.
- ◆ Old Growth – Monitoring items #11 and #45.
- ◆ Riparian Habitat and Watershed Quality and protection – Monitoring items #5, #6, #8, #19, and #46.

Monitoring intervals for fish, plant, and wildlife are determined based on ID Team knowledge and experience and by using existing condition assessments for terrestrial and aquatic ecosystems and the Historic Range of Variability report. They were reviewed by Regional Office and state agency resource management professionals.

Planning Comment #8 ***The Forest exhibited a bias towards local sentiment while being ignorant of national public views and values.***

The project record contains the strategies used during the forest plan revision process to engage non-local citizens. The public involvement plan, which was first developed in 2000 and revised numerous times, specifically listed the website and newsletters as the primary means for reaching and informing non-local citizens. Many comments on the DEIS/Draft Revised Plan were received from non-local citizens, which indicate that not only were distant people informed on the Bighorn revision process, but they actively participated. The Record of Decision indicates that non-local input was considered in reaching the decision.

Planning ***Commenter stated that there was 'an inexplicable purging of direction from the 1985 Forest Plan'. Completely discarding all management direction from the 1985 Plan is a fundamentally flawed approach to revising a Forest plan, and this approach should be abandoned.***
Comment #9

There is no specific direction on what to retain when revising forest plans. During the forest plan revision process, the ID Team reviewed past monitoring reports. The review indicated potential items requiring modification (see following list). These potential changes were documented in the Notice of Intent to revised the Plan, the "What's Broken" document, and in Chapter 3 of the Analysis of the Management Situation.

- ♦ Monitoring showed that some 1985 Plan direction was unenforceable, undefinable, unmeasurable - such as the the defintion of when an opening is no longer an opening using potential water yield.
- ♦ Range standards and guidelines changed over time, due to better science and work with grazing permittees.
- ♦ The science of measuring, monitoring, and managing resources improved (e.g., elk security replaced hiding cover).
- ♦ New laws were enacted, including the Native American Grave Protection and Repatriation Act of 1990, the Federal Onshore Oil and Gas Leasing Reform Act of 1987, etc.
- ♦ New internal methodologies were adopted; for example, the Scenery Management System (SMS) replaced the Visual Integrity System (VIS) as a method for evaluating scenic intergrity.

Many standards and guidelines from the 1985 Plan were used and carried forward in the Revised Draft Plan as evinced by the bracketed footnotes following each standard and guideline indicating its source.

Planning ***The Forest failed to include a Schedule of Proposed Actions in its Revised Forest Plan.***
Comment #10

This comment did not result in changes between draft and final, because the Schedule of Proposed Actions is not a forest plan requirement. The Schedule of Proposed Actions (SOPA) is required in Forest Service Handbook 1090.15. This document is published quarterly and is provided to all interested stakeholders. While there is no legal mandate to include a Forest's SOPA in its plan revision, the Revised Forest Plan does reflect some proposed and possible actions through its timber sale charts and use of the SOPA to help forecast future outputs and activities. Inclusion of a SOPA's three month outlook does not coincide with the strategic and long-term (10-15 yrs) nature of a Forest Plan.

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**Planning
Comment #11** ***Desired future condition of the forest ... isn't accurately described.***

The Forest needs to acknowledge that fire, insects, and disease will be the largest drivers affecting desired future condition.

Between Draft and Final, a number of improvements were made to the desired future condition (DFC) discussions. Forestwide DFCs for forested structural stages were developed for each major cover type for both suited and unsuited for timber production lands. These DFCs were developed by the ID Team and reviewed by Wyoming Game and Fish and State Forestry. The ID Team estimates that natural processes of growth and mortality, fire, and insects and disease will have the most significant influence upon the 700,000 acres of forested area. Timber harvest will play a more significant role on lands suited for timber production and in high value areas, such as the wildland-urban interface.

**Planning
Comment #12** ***We would like to suggest local ranchers and businessmen sit on the committees that make Forest Service decisions for their areas.***

While the input of private citizens is invaluable and an integral part of forest plan revision process, the decision-making authority legally resides with the Regional Forester and cannot be delegated or shared with private participants. The Federal Advisory Committee Act (as amended by the Unfunded Mandates Reform Act of 1995) specifies that non-elected, non-federal employees cannot provide advice on federal planning/decision-making processes.

During the forest plan revision process, citizen input was solicited through an array of public meetings. Additionally, the plan revision ID Team met monthly with an advisory Steering Committee composed of state agency representatives and locally elected officials. These monthly meetings were publicized and open to the public.

This comment did not result in changes to the collaborative process used to revise the Bighorn forest plan.

**Planning
Comment #13** ***Most proposed changes to the S&Gs result in weaker direction than was in the 1985 Plan. Essentially all of the proposed S&Gs are generally vague, discretionary, and unenforceable.***

The Forest ID team reviewed all the standards and guideline between Draft and Final to ensure that the direction was explicit, understandable and enforceable. The following table lists direction in the Revised Plan that is stronger and more specific than that in the 1985 Plan.

Guideline	1985 Forest Plan Direction	Revised Plan Direction
Coarse Woody	Example for lodgepole:	Much more explicit spatial, size and

Guideline	1985 Forest Plan Direction	Revised Plan Direction
Debris	33 linear feet per acre 10 or more inches in diameter.	total amount direction based on specific research (Graham, et al, 1994) which includes a worksheet for measuring the 7-16 tons per acres specified. Biological Diversity guideline 10.
Old Growth	In forested areas, maintain 5% or more in old growth. No definition, or differences for cover types.	Biological Diversity guideline 4 is based on Historic Range of Variability study by Meyer and Knight (2003), and a definition of old growth by Mehl (1992) which recognizes how old growth is manifested in different cover types. The guideline includes direction for an old growth inventory, spatial distribution, and recognition of the dynamic nature of this resource.
Desired Future Conditions	5% early, 5% old growth. There were additional structural stage desired future conditions shown in the FEIS.	Old Growth percentages are listed in Biological Diversity guideline 4. Distributions of desired forest structural stages by cover type, and by cover type by Forest Plan geographic area, are shown in Chapter 1 and Chapter 3, respectively.
Watershed Best Management Practices (BMP)	BMPs were not developed in 1985.	Revised Plan incorporates Watershed Conservation Practice Handbook measures, which meet or exceed State BMPs. Soil, Water, Riparian and Wetland Guideline 1.
Cultural and Historic Preservation	Little, if any, direction in Plan, other than Medicine Wheel HPP amendment.	Identified Historic Districts (Heritage Guideline 5 and Appendix A), prioritized sites for National Register recommendations (Heritage Guideline 6), among other direction. Historic District identification allows forest to manage for historic themes as opposed to 'protecting' individual sites. In addition, Objective 2b, Strategies 1-5 describe a robust, proactive Heritage program.
Fire Appropriate Management Response	No direction in Plan; default was suppression across forest.	Fire guidelines 1 and 2 recognize fire as a tool that can be used to manage fire-dependant ecosystems in appropriate locations.
Near-stream habitat	No direction in Plan.	Biological diversity guideline 9. Based upon a variety of research throughout the National Forest System, this guideline was developed to recognize that upland habitat within 300' of streams is an important area for many

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Guideline	1985 Forest Plan Direction	Revised Plan Direction
		species.

Planning Comment #14 *The USFS has not used the NEPA process to achieve the requirements of 7 CFR 1b2.b, which states that “All policies and programs of the various USDA agencies shall be planned, developed, and implemented so as to achieve the goals and to follow the procedures declared by NEPA in order to assure responsible stewardship of the environment for present and future generations.”*

The Record of Decision was developed with this requirement in mind. The Record of Decision indicates how various resource benefits and costs were weighed. In light of the Forest Service multiple use mission, responsible stewardship equates to assuring long-term sustained yields, viable species, and clean water. The Revised Plan adopts direction that assures these stewardship responsibilities are met, through growth and yield calculations and modeling; through species strategies, standards and guidelines, and monitoring measures; and through the Watershed Conservation Practice Handbook direction.

Planning Comment #15 *The DEIS does not satisfy the requirement for the agency to disclose any irreversible and irretrievable commitment of resources involved in a proposed action or the alternatives evaluated in an EIS. Specifically, the DEIS does not address the following: 1) development of previously undeveloped lands, 2) logging of old growth and stands that have never been logged before, 3) logging and road construction in other kinds of wildlife habitat, 4) reductions in scenic quality and recreation opportunities, and 5) reductions in water quality*

Irreversible and irretrievable commitment of resources are discussed at the end of DEIS Chapter 3 per direction in 42 USC 4332(2)(C)(v)). In general, the forest plan revision process is programmatic and endeavors to construct a broad management strategy for the Bighorn National Forest. Plan revision documents (Draft and Final LRMP, Draft and Final EIS, ROD) contain strategic and programmatic direction and do not make site-specific, project-level decisions. The programmatic nature of the planning documents do not allow for irretrievable or irreversible decisions to be made without the appropriate level of subsequent analysis, public comment, and disclosure of findings.

Planning Comment #16 *Cooperating agency status is an excellent mechanism that needs to be kept in place and continued to be improved upon.*

The relationship that has been built between the Bighorn National Forest and its cooperating agencies have been invaluable in the plan revision process. State and local agencies have participated in various roles including Steering Committee participation, input to the Draft Plan, and contributing to analysis and decision-making. These relationships will continue to help the Forest Service in its implementation of the Revised Plan. Two items in the Revised Plan that indicate the Forest's intent to continue the collaborative dialog are the bi-annual public monitoring meetings (Chapter 4 Monitoring and Evaluation) and the strategy for multi-party collaborative input at the geographic area or large area scale.

Planning ***Stewardship contracting should be delineated in the Final Plan***
Comment #17 ***and used to achieve resource objectives.***

A strategy was included in the Revised Final Plan to implement this idea. See Revised Plan Chapter 1, Goal 2, Objective 2c, Stewardship Strategy 1.

Planning ***No public comment meetings were held in Casper, one of the***
Comment #18 ***largest communities near the southern border of the Forest.***

The public involvement plan was developed by the Forest Leadership Team and discussed with the Steering Committee. We chose to concentrate public meetings on the four-counties with Bighorn National Forest land and in Gillette. The possibilities of including Thermopolis, Cody, Billings, and Casper were discussed; however, due to higher costs and small turnouts expected, the Forest Supervisor chose to limit public meetings to the communities listed above. People in Casper had the option of attending meetings held in Buffalo.

Planning ***Why not select an alternative that has the greatest economic***
Comment #19 ***benefit to the region and nation?***

The Multiple Use Sustained Yield Act states:

"The national forests are established and shall be administered for outdoor recreation, range, timber, watersheds, and wildlife and fish purposes ... that some land will be used for less than all of the resources; and harmonious and coordinated management of the various resources, each with the other, without impairment of the productivity of the land, with consideration being given to the relative values of the various resources, *and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output.*"

The Forest Service is charged with balancing multiple use issues that include, but are not limited to, local and national economic benefits. The 1982 Planning Regulations, 36 CFR 219.3, further clarifies the notion that Forest Plans are to maximize net public benefits, which are measured by multiple criteria rather than a single measure or index.

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Planning ***I want RS 2477 completely honored***
Comment #20

As with all laws, RS 2477 will be honored to the degree it is applicable. Because the Bighorn was an early Forest Reserve (proclaimed by President Cleveland in 1893), there were few established public roads within the area currently covered by the Bighorn National Forest.

Planning ***There were many comments supporting, or arguing against, all***
Comment #21 ***alternatives.***

The Record of Decision (ROD) lays out the Regional Forester's rationale for selecting Alternative D-FEIS for the Revised Plan. Alternative D-DEIS was used as the base template, and the best suggestions and ideas from all the comments, the other alternatives, additional analysis, and cooperating agency input was used to develop the Revised Plan.

Rangeland Vegetation

Rangeland Vegetation Comment #1 ***Livestock grazing is causing deleterious impacts to riparian areas and streambank stability.***

The Forest recognizes the need to protect riparian areas from certain management activities, including livestock grazing. The Revised Plan contains standards and guidelines that are expected to reduce riparian and streambank impacts associated with grazing. Please reference the Biological standards and guidelines outlined in the Chapter 1 of the Revised Plan.

Recreation

Recreation Comment #1 ***Provide a variety of OHV opportunity skill levels/challenges.***

Please see Plan Chapter 1, Goal 4, Objective 4c, Strategy 2.

Recreation Comment #2 ***Trailer parking area (for storage when not in use) would be desirable.***

A designated area currently exists for this purpose on the Medicine Wheel / Paintrock Ranger District. This site is not receiving enough use to warrant the creation of another such site at this time. Should such a site be necessary during the next planning period, it would not be precluded by the direction contained in the Final Revised Plan but would require site-specific analysis and a decision at the project level.

Recreation Comment #3 ***We need an adequate number of dispersed campsites. We are concerned about limitations on number of sites.***

Management area 5.5 Dispersed Recreation and Forest Products was added to the Revised Plan, whereas it was not in the preferred alternative for the Draft Plan. This MA was displayed in Alternative E of the Draft Plan, and because of people's comments, was included in the Revised Plan.

Management area 5.5 contains direction which specifically promotes dispersed campsites and has been allocated to popular dispersed camping areas such as Woodrock, the area south of Little Goose, and the area east of Black Butte. Nothing in the Revised Plan would preclude designation, at the project level, of dispersed campsites in other management areas provided that water quality and other considerations were met.

Recreation Comment #4 ***The plan should set aside easily accessible areas for nonmotorized recreation in the winter.***

The Draft Plan did not include any such areas. However, based on this comment, the

COMMENTS AND RESPONSES

Final Revised Plan includes two easily accessible MA 1.31 (year-round nonmotorized) areas – Salt Creek and Turkey Creek.

***Recreation
Comment #5*** ***The Final Plan should contain direction related to rock climbing. Currently the BNF has no plan direction which specifically addresses rock climbing – these are needed so the Forest can be prepared to manage this activity.***

There was no direction in the Draft Plan, but Goal 2, Objective 2a, Strategy 11 was added for the Revised Plan. It directs the Forest to inventory existing rock climbing routes including approach, associated trail locations, and human impact. It also stipulates that within 10 years, the Forest will develop climbing management plans for two areas on the Forest where routes are established or are being established.

***Recreation
Comment #6*** ***The primary use of National Forest System lands should be quiet recreational pursuits.***

While "quiet pursuits" are popular activities on the Bighorn, motorized recreation is also a legitimate use of National Forest System lands. The key in terms of a management approach is sustaining an appropriate overall balance and location of these uses so as to best minimize conflict. The Revised Plan is an attempt to balance these uses with other recreation uses and the other resources on the forest.

***Recreation
Comment #7*** ***The Forest should state that all existing recreation residences are Plan-consistent uses.***

The Forest has conducted a recreation residence consistency review which has determined that all recreation residence tracts are consistent with the Forest Plan, pending additional site inspections. The additional inspections, particularly those needed to ensure compliance with aquatic-related issues, are scheduled for the summer of 2005. This was addressed in the Recreation section of FEIS Chapter 3. If cabins are not in compliance with their permit, additional work may be required on a cabin-by-cabin basis to ensure compliance with the permit and Forest Plan conditions prior to permit reissuance in 2008.

***Recreation
Comment #8*** ***The Forest needs to construct more restrooms on US Hwy 16.***

Restroom construction would be a site-specific issue and is outside of the scope of forest plan revision. The Forest Staff shared with the Washakie County representatives that the Revised Plan allows for construction of such a facility along U.S. highway 16 on the National Forest System land, but that the Forest Plan is not the vehicle for making this type of decision. This conflict has been identified in the FEIS Chapter 3 Potential Conflict with the Goals/Objectives of Other Agencies.

***Recreation
Comment #9 It is essential that the agency has a clear analysis of recreational
and other demands for forest use.***

A recreation analysis of forest use was conducted for the plan revision, the methodology of which is discussed in FEIS Appendix B. For the Final EIS, the Forest used the more statistically valid NVUM survey results for the Bighorn NF as opposed to the Forest Recreation Use Data (FRUD) that was used for the Draft EIS. This put the Bighorn at the forefront of use analysis among National Forests in plan revision and is discussed in the recreation section of the FEIS. In addition, the Final Environmental Impact Statement includes a new section specifically on travel management.

***Recreation
Comment #10 Use the Recreation Opportunity Spectrum (ROS) as a
management tool in Forest Plan revision.***

The ROS has been used as a management tool in the Revised Plan. The commentor is referring to each management area, which specifies an adopted ROS classification as a guideline. In addition, forestwide direction for ROS can be found in Revised Plan, Chapter 1, General Recreation Standard #2, Developed Recreation Standard #1, and Dispersed Recreation Guideline #1.

***Recreation
Comment #11 Use visitor fees to manage recreation***

The ability to charge fees on National Forest System lands is a site-specific decision and not a part of the forest planning process, which is aimed at land allocation. Congress has given the Forest authority to charge fees at a limited number of sites, and we will continue to look at this tool as one of the many ways to accomplish needed work on the forest. We are also working with the state to utilize some of the funds generated through their snowmobile and OHV sticker programs.

***Recreation
Comment #12 Use education as a recreation management tool in the Revised
Plan.***

Education is, in fact, a critical component of recreation management and has been addressed in the Plan in many areas. See Revised Plan, Chapter 1, Goal 2, Objective 2c, Strategy 3; Goal 2, Objective 2c, Tourism and Recreation Strategy 2; Goal 4, Objective 4a, Strategy 1; Goal 4, Objective 4c, Strategy 5; General Recreation Guideline 2; General Recreation Guideline 6.

Research Natural Areas

RNA *“I feel the designation of Research Natural Areas would be vital to the continuation of this type of work [rare and sensitive plant species studies].”*

Comment #1 *“We do not feel that additional RNAs are necessary on the Forest at this time. The Lake McClain area, in particular, is of concern to us since it will cause negative effects of current Forest Service grazing permittee.”*

There was strong support for and against RNA designation. The Final Revised Plan did not include the Lake McClain and Pheasant Creek RNAs, and size of the Mann Creek RNA was decreased. These changes were necessary because of conflicting uses, or conflicting management area allocation (recommended wilderness) in the case of Pheasant Creek. While these conflicts were relatively minor, the primary reason for not including these areas in the Final Revised Plan is that the final management area allocations would largely continue the current management. Therefore, since current management has resulted in conditions well-suited for RNA designation, it is believed that these areas could be designated as RNAs in future revisions.

Concerning the ‘conflicting direction’ between recommended wilderness and RNAs: We are aware that there are several instances of RNAs within wilderness areas. However, there are managerial and legal differences between these two designations, primarily in recreation management and objectives. Wilderness implies that some level of recreation use is encouraged, and is a primary objective of designation. However, in the case of RNAs, recreation use is typically ‘allowed’ if it does not conflict with the establishment objectives, which is considerably different from encouraging and promoting recreation use.

Roadless Areas

Roadless *Protect all roadless areas. Protect Protect Rock Creek, Medicine*

Comment #1 *Lodge, Lodge Grass Creek, Pete’s Hole, Cedar Creek, Little Bighorn, Walker Prairie, Piney Creek, and Rock Creek.*

Protect the five areas recommended for wilderness in Alternative C (Rock Creek, Walker Prairie, Little Bighorn, Devils Canyon, MedicineLodge).

We received many comments both supporting and opposing retention of roadless areas. Management area allocation of inventoried roadless acres in the forest plan provides for a range of uses including areas limited to nonmotorized use and areas allowing motorized use. Please see the table titled “Allocation of Inventoried Roadless Acres to Various Management Areas by Alternative” in the Roadless section of Chapter 3 for a summary and the individual roadless area “Environmental Consequences” in FEIS Appendix C for details.

- Roadless** **Protect roadless areas:**
- Comment #2** *By leaving them intact*
- By recommending them for wilderness designation*
- With designation other... “than wilderness to allow management activities such as prescribed burns, weed control and placement of comfort stations”*
- By allowing local forest representatives to address decisions on a case-by-case basis*
- By maintaining areas “... using various management strategies”*
- By allowing no new road construction*
- By applying the Roadless Area Conservation Rule (RACR) provisions*

Management area allocations in the Revised Plan provide a range of protection and management for inventoried roadless areas, similar to the range of suggestions received. A U.S. District Court decision enjoined implementation of the RACR, although the decision has been appealed. Applying RACR is not a current legal option.

- Roadless** **The 2003 Roadless inventory is flawed for the following reasons:**
- Comment #3** *Failure to identify all roadless areas*
- Failure to include “maps to show which areas inventoried and determined were or were not roadless” in the DEIS.*
- Failure to conduct on-the-ground roadless inventories*
- Failure to identify roadless areas that may not be eligible for wilderness*
- Improper disqualification of un-maintained routes*
- Improper disqualification of narrow roadless areas including Leigh Creek*
- Improper adjustment of roadless area boundaries for manageability*
- Improper application of buffers inside roadless areas.*
- Re-inventory roadless areas*
- Use the RACR inventory instead of the current inventory.*

The purpose of the roadless inventory is to identify roadless areas with wilderness potential. Flaws in the 2003 inventory were identified. The 2005 roadless inventory added 117,232 acres, not included in the 2003 inventory, including five small areas contiguous with the Cloud Peak Wilderness.

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The 2003 Roadless Inventory Map is at page 3-356 in both paper and electronic copies of the DEIS. The map was posted on the Bighorn web site on or before June 16, 2004. The record shows the commenter received copies of the maps prior to release of the printed DEIS. The commenter also received advance copies of the 2005 roadless area inventory maps.

There is no procedural requirement for on-the-ground survey. Maps prepared by for the Citizens Conservation Alternative were transferred to an electronic GIS format and considered the development of the roadless inventory. Maps and photos of roadless areas developed by Forest Service volunteers, organized by the local Sierra Club, were reviewed and considered in development of the roadless inventory. Important source material for the 2005 roadless area inventory included GIS data bases, orthophoto quadrangles, aerial photography, and timber sale records. The field knowledge of Forest Service employees, volunteers and wilderness advocates was utilized in map reviews. Actual field visits were made on a limited basis including one visit with a Wyoming Wilderness Association representative.

The record includes an inventory and evaluation of areas without classified roads between 2005 and 5000 acres in size. Small areas without classified roads were considered by the team in development of alternatives

Temporary roads, unclassified roads (abandoned roads, obliterated roads, user-created roads, etc.) and motorized trails all occur in “essentially roadless and undeveloped areas” and occur in the inventoried roadless areas. Any road in the classified system has both a past and future use (FSM 7712.5). Inventory and periodic inspection of classified roads is the most basic level of road maintenance established by road management objectives (FSM 7730.3). As a minimum, all classified roads receive this level of maintenance. All classified roads, including many two-track routes, are excluded from inventoried roadless areas. Disregarding the presence of a classified road in an area in order to inventory the area as roadless is not a viable management practice. Roads in roadless areas do not make sense to the general public

Narrow areas were individually reviewed and boundaries were identified by hand on 1:24000 scale maps for the 2005 inventory. Leigh Creek was added to the areas evaluated and determined to be not capable.

The 2005 inventory of roadless undeveloped areas is for the purpose of identifying potential wilderness was conducted in accordance with FSH 1909.12 - 7.1, 7.11 and 7.11(a). FSH 1909.12 - 7.12 describes the process for listing and mapping roadless areas. It also directs the reader to “FSH 1909.12 – 7.25 for guidelines on establishing adjusting and mapping boundaries of areas recommended for wilderness designation.” This direction was followed in the mapping boundaries in the 2005 roadless area inventory.

The use of 300 foot buffers along existing road was established methodology in the RARE II inventory. It reflects long -standing travel management regulations, limiting movement of motor vehicles for camping and other activities to a corridor 300 feet

either side of a road.

The 2003 Roadless Area Inventory in the DEIS has been replaced by the 2005 Roadless Area Inventory in the FEIS. The inventory included in the RACR analysis was dated 1984. The 2005 Roadless Inventory considers changes between 1984 and 2005. Examples of these changes include timber harvest, timber salvage, road construction, and a new roads analysis rule.

<i>Roadless Comment #4</i>	<i>Defining Roadless Character -Losing and Gaining Roadless Areas</i>
	<i>A. Once roaded the roadless quality is lost forever.</i>
	<i>B. "The revision of the Bighorn Forest Plan calls for a reduction in ALL roadless areas in All alternatives."</i>
	<i>C. Roadless tracts are the resource or commodity disappearing at a fast pace in north central Wyoming</i>
	<i>D. "Are you looking in the planning process at an alternative that would decommission some of the open roads that were located in the roadless areas under the RARE II inventory so that in the future the roadless inventory could move toward the RARE II inventory figure?"</i>
	<i>E. "if a road is built to facilitate logging...is there some reason they cannot be blocked off and reclaimed as soon as they are no longer needed for that particular undertaking?"</i>
	<i>F. "We need more roadless areas rather than less."</i>
	<i>G. "In your estimation what percentage of the acres in the 2003 inventory will remain in the inventory at the end of the plan's projected life, or put differently, how many acres would you project as eligible for the next inventory?"</i>
	<i>H. The planning documents mischaracterize the effect of the proposed plan on inventoried roadless area by exaggerating the effect of all management area categories. Actual effects would be much less than described.</i>

#4 A - D. Some people think of roadless areas as pristine areas where natural processes have exclusive sway, while other people think of roadless areas as nothing more than an area without an open road. A discussion of roadless settings and a map illustrating varied settings was included in the roadless section of FEIS Chapter 3. Controversy over roadless areas has lead to a complex stylized definition of roadless character used for roadless inventory.

#4 B - H. Whether or not development of an area precludes a return to roadless condition depends on the scale of development, intensity of development and time for ecosystem recovery. A description of the roadless definition and inventory process used is in Appendix C of the FEIS. These comments contributed to a strategy for use of short duration roads in Chapter 1 of the Revised Plan (Goal 2, Strategy 2c) and to an

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improved analysis of effects on roadless areas. An estimate of roadless acres affected by management activities during the next 15 years was added. The recent trend converting low standard, classified roads to motorized trails with a resulting increase in roadless area was noted. Given the local and specific nature of issues, decisions to decommission roads are outside the broader scope of forest plan revision.

**Roadless
Comment #5** ***“The plan’s treatment of roadless areas, as far as it explains, is not in compliance with the U.S. District Court decision enjoining implementation of the RACR. These areas are to be managed according to the Organic Act, Multiple-Use Sustained Yield Act, The Wyoming Wilderness Act and other statutory requirements.”***

You are correct in noting that many statutes apply to National Forest System lands including roadless areas. The status of the RACR changed several times during preparation of the DEIS. Some uncertainty remains, as the U.S. District Court decision enjoining implementation of the RACR has been appealed. This comment was used to modify the analysis. In the FEIS, RACR is discussed in the historical summary of roadless. Definitions from RACR are no longer used in the analysis of effects on roadless areas.

**Roadless
Comment #6** ***Impacts to Roadless and Undeveloped Qualities***
1. The impacts of development including but not limited to, the loss of natural character, loss of backcountry recreation opportunities, foreclosed wilderness opportunities, loss or reduced opportunity for Research Natural Areas (RNAs), and loss of scientific baseline information, are not adequately acknowledged and addressed.

At the forest plan scale, impacts are the result of management area allocations and the standards and guidelines associated with them. More detailed analysis of potential impacts occurs at the project level application of NEPA when specific actions are proposed.

In addition to the discussion of impacts in the roadless and wilderness sections of the FEIS Chapter 3, impacts on the many and varied qualities of all areas, including roadless and undeveloped areas are discussed in other sections of the FEIS Chapter 3 including, scenery, recreation, wilderness, and RNAs. Sections on the physical and biological elements evaluate impacts from scientific perspectives.

Roadless Areas and Wilderness

*Roadless /
Wilderness
Comment #1*

“Erroneous assessment of wilderness capability.”

- 1. Hideout Rocks – Area was found “not capable” due to traffic on nearby roads and small size. Narrow shape was noted. Forest Service must find an area with some wilderness qualities “capable” regardless of nearby roads, size, or shape.*
- 2. Bear Rocks – The description of capability and availability analysis was omitted from DEIS denying an opportunity to comment on the “not capable” determination.*
- 3. Hazelton Peaks – Area was found “not capable” because of a low level of manageability, limited primitive recreation opportunities, indistinct boundaries, and surrounding development. Other roadless areas in other places with these characteristics have been designated as Wilderness; therefore the Forest Service must find this area “capable.”*
- 4. Cloud Peak Contiguous South – Area was found not capable because of low level of manageability and disturbance from nearby roads. Other roadless areas in other places have these characteristics and have been designated as Wilderness. “The Cloud Peak ... Area should be deemed capable of being designated wilderness; at the final decision stage, the USFS is still free to decide the area is not of sufficient quality to warrant recommendation.”*

#1 A.1., 3., and 4. The Forest Service Handbook capability assessment discussion identifies the fact that different parts of the country may assess natural characteristics for wilderness suitability differently and that while the Handbook identifies and discusses the five characteristics, there is a considerable amount of latitude in developing the capability assessment. “The combinations of basic natural characteristics are of infinite variety. No two areas possess these characteristics in the same measure. The combinations that may be appraised in one section of the country as being highly desirable for wilderness designation might be appraised as nominal or negative in another.” (FSH 1909.12 - 7.21).

#1 A.2. The capability assessment for the Bear Rocks area was in fact omitted from DEIS, Appendix C. This error is corrected in the FEIS.

COMMENTS AND RESPONSES

**Roadless /
Wilderness
Comment #2**

“Erroneous wilderness availability assessment.”

The Forest Service did not comply with FSH 1909.12 - 7.22 and 7.22a, which clearly means “... that any roadless area which meets wilderness capability requirements must also be considered available for consideration as wilderness, except in very extraordinary circumstances where there are serious and well documented conflicts with designating the area as wilderness.”

Availability determinations were reconsidered in response to this comment. FSH 1909.12 7.22 includes the text “The effect that wilderness designation and management is likely to have on adjacent lands is also a necessary consideration in evaluating availability. Determine the effect of such designation on transportation systems outside the wilderness and identify the requirements for wilderness access and traveler transfer facilities.” Where a roadless area was impacted by the sights and sounds of motorized use and created an important buffer between motorized recreation and Wilderness, the area (ex. Cloud Peak Contiguous North) was determined not available for wilderness.

FSH 1909.12 – 7.22a describing lands generally unavailable for wilderness includes the statement “5. Land needed to meet clearly document resource demands such as for timber and mineral production or for developed recreation areas such as winter sports sites.” The record shows considerable demand for motorized recreation access. In cases where existing motorized trail use was substantial (e.g., Piney Creek), the area was deemed not available.

**Roadless /
Wilderness
Comment #3**

“Erroneous assessment of wilderness need”

- 1. The focus of the assessment is primarily local and is not an assessment of national need or desire.***
- 2. “The USFS must redo the needs assessment to consider wilderness opportunities in the states located east of the Bighorn Mountains.***
- 3. The wilderness needs assessment does not adequately consider landform and ecosystem types.***
- 4. The importance of providing wilderness to meet the needs of various species , including those sensitive to human disturbance, those persecuted by humans, and those subspecies unique to the Big Horn Mountains.***
- 5. Failure to consider growth in population and in off-road vehicle use.***

All public comment – local and national – was considered in the development of the final need analysis, the alternatives, and the record of decision. This comment was used to improve the analysis of wilderness need. The need analysis (Appendix C) includes a discussion of nearby population centers, population growth rates, the decline in

wilderness opportunity east of the Rocky Mountain, and visitor use in the existing wilderness.

A description of landforms and features at a small scale are included in the description of each roadless area. As the National Hierarchical Framework of Ecological Units indicates, landforms and ecosystems can be evaluated at numerous scales. Geology, soils, elevation, precipitation and many other factors influence the natural variety of the landscape. Vegetation (e.g., covertypes) was chosen as the best available indicator of the varied ecotypes on the Bighorn. This allowed us to make comparisons between the Cloud Peak Wilderness and roadless areas as well as between roadless areas.

Wilderness is a legal designation and does not necessarily provide superior habitat for species as their presence in roadless areas attests. Please review the “Wildlife Needs” section of the need analysis in FEIS Appendix C for a complete discussion.

**Roadless / Wilderness
Comment #4** ***The flawed and illegal roadless area inventory that improperly excludes previously inventoried roadless lands from roadless status and wilderness consideration are so serious they warrant preparation of a revised or supplemental DEIS and Proposed Revised Forest Plan (PRP) The public has not had an adequate opportunity to comment on the inventory and management of roadless areas.***

A new roadless area inventory dated 2005 was prepared after release of the DEIS and PRP. The revised inventory added a total of 117,232 acres to the roadless inventory. 6,437 acres were included in four small areas contiguous with the Cloud Peak Wilderness and 6,700 acres were included in the Leigh Creek area. The remaining acres were added by boundary changes to areas included in the 2003 roadless area inventory.

Most people did not offer detailed or explicit comments on the roadless inventory boundaries. Where explicit comments were provided, the administrative record shows that we considered the comment and frequently made the suggested change. Examples are the addition of Leigh Creek to the roadless inventory, the addition of acres to the Hazelton Peaks roadless area, the addition of acres in Shell Canyon to the Horse Creek Mesa roadless area, and the inclusion of the proposed Pheasant Creek RNA in the Rock Creek area recommended for wilderness designation.

**Roadless / Wilderness
Comment #5** ***“Need for a wilderness champion on the BNF Planning Team”***

Staffing decisions are outside the scope of the Forest Plan revision. The interdisciplinary team consisted of a broad spectrum of resource professionals, and several have work experience in wilderness management. It is not the intent of 36 CFR 219 regulations describing the interdisciplinary team makeup that each and every resource have a ‘champion.’

COMMENTS AND RESPONSES

**Roadless / Wilderness
Comment #6** *There is a constant ‘nibbling’ away of multiple use during forest planning – every time there is a plan, there is a little bit more wilderness. It seems reasonable, at the time and incrementally, to have a ‘little bit’ allocated to wilderness, but after a few rounds of planning, you end up with nothing but wilderness. Where does it end?*

The Revised Plan includes the Rock Creek Wilderness recommendation. This decision was made because this is a high quality potential Wilderness. In addition, Rock Creek almost made it in the 1984 Wyoming Wilderness Act, so it was recognized as high quality potential wilderness at that time. This recommendation is not a ‘bone’ to appease one side of the preservation/utilization spectrum. It is based on the analysis that Rock Creek meets the criteria for high quality wilderness and there is a need for wilderness on the Bighorn, especially to fill the ‘lower elevation, forested’ ecological niche not offered in the existing Cloud Peak Wilderness. In addition, many people commented in favor of this recommendation. At the time of the next revision, the decision maker will be looking at the same, finite, 1.1 million acre Bighorn NF landbase. However, 20% of the Bighorn NF will be wilderness or recommended wilderness as opposed to the 17% that existed before this recommendation. Each time that number gets higher, there will be harder to find a sufficient need, and areas that are of high quality to justify wilderness recommendation.

Scenery

**Scenery
Comment #1** *Scenery Corridor Allocations*
1. We concur in your decision to place the existing highway corridors within the 4.2 Scenery Management Area as in Alternative D. We believe Forest Management Plans should identify highway corridors with a separate management designation that reflects highway uses and management. Your Management Plan Preferred Alternative D is a good example of the way we believe it should be done.
2. I recommend the BHNF manage the areas as scenic as in alternatives B,C,D, with the addition of Shell Creek as in alternative A and D.

Thank your for your comment.

**Scenery
Comment #2** *The Forest Service failed to disclose irreversible and irretrievable commitments due to logging and road construction that result in a reduced scenic quality and recreation opportunities.*

This comment was used to improve the analysis of impacts to scenery. While impacts

of logging may be very long-term, well-planned and executed; harvests do not generally result in an irretrievable commitment of resources. Development of permanent, high-standard roads is more likely to be irreversible than development of short duration or temporary roads.

Scenery
Comment #3 ***The foreground zone along concern level 1 & 2 roads and trails and use areas should be limited to 1/8 mile in Management areas 5.11, 5.12, 5.4, and 5.5.***

The foreground zone is defined by the degree of detail visible to an observer and is generally found within ½ mile of the observer (Agriculture Handbook #701). Using a foreground zone definition, of ¼ to ½ mile in guidelines for the Category 5 management areas, is intended to avoid creating a narrow band of untreated trees that screens more active management, since a vegetative screen will decline with time. It is also intended to allow varied timber treatments that provide visual interest next to roads, trails and use areas where forest users numbers are highest.

Scenery
Comment #4 ***Managing Scenery Corridors***
1. I would encourage the Forest Service to consider forest harvests near some of the highways and provide educational signage that explains the value to individuals, our community, society, and the forest.
2. You have scenic corridors but they are not managed for that, i.e. trailers parked along the roads - need to create more areas like Bull Creek to get them out of sight.

The desired condition, standards, and guidelines for M.A. 4.2 – Scenery will accommodate a wide range of active management including timber harvest, interpretive signs, and recreation site development. We will keep your ideas in mind as projects are developed.

Scenery
Comment #5 ***Goal 2, Objective 2c, Scenery Strategy 1, specifying treatment of 100 acres each 5 years could be read as an upper limit constraint. Could it include grazing? The wording is neither specific nor directed at a specific goal or outcome. Reword to clarify that scenic areas will be treated as any other lands except that uses must be compatible with scenic objectives.***

This comment resulted in revision of scenery strategies to clarify the intent.

COMMENTS AND RESPONSES

**Scenery
Comment #6** *The Forest Service had failed to bring in the scenic byways management plan into the forest plan revision.*

The scenic byways plan was not a decision document. It includes many project level ideas as well as some forest plan scale concepts. The constituent surveys conducted as part of the scenic byways plan were useful in developing plan alternatives and management strategies. The scenery and highway operations sections of the byway plan influenced the development of the 4.2 management area in the forest plan.

**Scenery
Comment #7** *The areas with MA 4.2 are fine, but we take visitors from the East on the road past Burgess Ranger Station to Fool Creek and out Dayton Gulch for a scenic tour. The road from Owen Creek to Tie Flume, Dead Swede and then the Red Grade to Big Horn is another scenic drive.*

There are many fine scenic drives on the Forest. Forest-wide guidelines for scenery and scenery guidelines in some specific management area will help us manage popular routes.

Soils

Soils Comment #1 *There was not an adequate inventory of soils or analysis of effects from management activities.*

There is a soil survey for the entire Bighorn National Forest (Nesser 1986) and that document is available upon request. Consideration of specific soil types for any management activity is conducted at the project scale and would not be appropriate to provide this type of analysis at the Forestwide scale.

Soils Comment #2 *An evaluation of soil stability related to livestock grazing should be incorporated into monitoring objectives.*

Livestock grazing is a diffuse activity and the use of streambank stability as a key indicator at the Forestwide scale would be inconclusive. Streambank stability is difficult to measure consistently over time. See Roper et al. (2002). Long-term monitoring stations are being established across the Forest and will help to answer the question on relative trend of stream channel and riparian area function. An evaluation of soil characteristics is usually conducted at the project planning level for site-specific Allotment Management Plans.

Travel Management

Travel Management Comment #1 ***Provide for increased OHV recreation opportunities - identify where OHV opportunities can be constructed when demand increases.***

The Revised Plan would not preclude the Forest's ability to provide for increased OHV recreation opportunities should demand increase as is projected. However, the key will be whether or not the resources are present to construct additional OHV opportunities (i.e., routes) at the site-specific level. This will be based on site-specific decisions subsequent to forest plan revision and will be dependent upon funding or other venues such as partnerships and volunteer efforts.

Travel Management Comment #2 ***Motorized travel should be restricted to designated roads and trails.***

Infrastructure-Travelways Standard #2 will result in the prohibition of motorized travel off of system roads and trails. It states

“On all lands outside of designated travelways, prohibit motorized travel unless the Forest Visitor Map or a Forest Order indicates that such use is specifically allowed. Allow over-snow vehicle use on snow unless specifically restricted.”

There have been project level decisions (Clear Creek / Crazy Woman Creek area, Woodrock area, Hunt Mountain – upcoming) on the Forest in an attempt to determine an appropriate network of motorized system routes.

Travel Management Comment #3 ***The forest needs to do a better job of enforcing its travel management program.***

Based upon public and steering committee comments on the Draft Plan, the following language was incorporated into the Final Revised Plan regarding law enforcement (Chapter 1, Objective 4a, Strategy 10):

“Actively pursue law enforcement or administrative actions on unauthorized uses. Incorporate an active public contact and education program into law enforcement efforts.”

Travel Management Comment #4 ***Eliminating C areas are acceptable, but the Forest should allow ATVs to travel off-route for game retrieval.***

It would not be feasible to offer a game retrieval exemption for several reasons. Input from Wyoming Game and Fish has indicated that there are no instances of where a game retrieval exemption for off-route travel has been successfully offered. In addition, off-route travel would disturb elk, to the detriment of other hunters in the area. Finally, this could result in the very problem that is being addressed through the elimination of “C” areas (areas which at the onset of plan revision still allowed for cross-country motorized travel) which is proliferation of user-created routes.

COMMENTS AND RESPONSES

Travel Management ***The forest should place a priority on increasing the***
Comment #5 ***maintenance of its trails.***

Budget allocations for trail maintenance are not decisions made in the forest planning process. Congress allocates funding. The Forest Service has conducted maintenance surveys for the conditions and needs required to rehabilitate and maintain the trails and is aware of the backlog and needs required. Reports on the condition of the trails and the backlog of maintenance were given to Congress.

Travel Management ***Incorporate more loop trails into the travel system.***
Comment #6

Loop trails and routes to featured destinations are desirable recreation opportunities and applicable direction was incorporated in the Final Revised Plan. Please see Goal 2, Objective 2a, Strategy 12 of Plan Chapter 1.

Travel Management ***Cooperative management regarding OHVs should be***
Comment #7 ***incorporated into the new Forest Plan.***

Additional direction has been added to the Revised Forest Plan pertaining to this. Please see Infrastructure-Travelways Guideline 1 and Goal 4 Objective 4c in Chapter 1 of the Revised Plan as well as Infrastructure / Travelways Guideline 1.

Travel Management ***Restrict snowmobiles to system routes.***
Comment #8

The ID team considered three issues when evaluating this comment: snowmobiling effects on plants and animals, potential conflicts with nonmotorized winter recreation, and feasibility of enforcement. The effects on plants and animals were assessed, and the only species believed to be affected is the Canada lynx. The Revised Plan contains standards and guidelines to address snowmobiling in Lynx Habitat Analysis Units. To address the issue of conflict with nonmotorized recreation, two 1.31 management areas were added between draft and final to provide nonmotorized opportunities. Implementing a forestwide requirement that snowmobiles remain on system routes is not practical given limited forest resources for patrol and enforcement. Currently, the Forest has the ability to close areas to snowmobile travel or require that they remain on system routes in areas where resource concerns dictate it (e.g., wildlife or the need to preserve primitive/semi-primitive nonmotorized areas).

Travel Management ***Ensure that MA 3.5 will not result in seasonal snowmobile***
Comment #9 ***closures.***

This management area is predominantly wildlife-based and in situations where wildlife and snowmobilers conflict, closures are one tool that will be considered. This would be addressed not at the project level, involving an appropriate opportunities for public input.

Travel Management Comment #10 The Forest needs additional emphasis on enforcement in the Plan in order to begin addressing travel management issues.

Additional forestwide direction related to law enforcement has been added to Chapter 1 of the Revised Plan. See Goal 4, Objective 4a, Strategies 1 and 10.

Travel Management Comment #11 The Forest is closing too many roads.

The Revised Plan itself will not result in the closure of roads. This is a function of site-specific travel management which takes place at the project level with an appropriate level of public involvement. The remaining area of the Forest which was open to off-route travel (which includes some user-created, nonsystem roads) will be restricted to motorized travel on system routes only. This is a necessity due to resource damage and management realities (limited budget for monitoring and enforcement) facing the forest. Infrastructure –Travelways Standard 1 was revised between draft and final in order to provide a programmatic guide that projects can tier to in assessing the need to close or decommission roads

Travel Management Comment #12 Increase fines for violation of road and trail restrictions.

This comment is outside the scope of forest plan revision. Penalties for law and regulation violations, such as illegal access, are set by the U.S. Courts or by Congress in legislation creating the law. The Forest Service only has the authority to recommend changes to the collateral forfeiture schedule for misdemeanor violations.

Travel Management Comment #13 There should be no new road construction and no net increase in roads on the Forest.

Road construction will be necessary to harvest the timber contained in the respective management areas under each alternative. This amount of road construction will be offset by the annual decommissioning target of approximately 4 miles, thus resulting in a net loss of road miles. This annual target of 4 miles is based on past and current funding levels, and the Forest's ability to identify these lengths of road for decommissioning using NEPA and roads analysis, during specific project development. In addition, roads needed for new timber harvest are not necessarily given to be new, permanently constructed roads. This shall be a project level decision, during project design.

Wild and Scenic Rivers

***Wild & Scenic Rivers
Comment #1*** ***There should be no Wild & Scenic River
recommendations included in the revised plan
whatsoever.***

The Little Bighorn River was identified as eligible for potential inclusion into the National Wild and Scenic River System in the 1985 Forest Plan. In the 1989 Wild and Scenic River Study Report and Final EIS on the Little Bighorn River, 19.2 miles of river were found suitable (USDAFS, 1989). The area was recommended for Congressional designation in August 1990, however Congress has not acted on this recommendation. Until Congress acts upon this recommendation, the Forest is obliged to continue to recommend the Little Bighorn as a Wild and Scenic River as part of its forest planning process. In addition, Section 5(d)(1) of the Wild and Scenic Rivers Act requires consideration of potential wild and scenic rivers in all federal agency planning for water and land resources, including forest plan revisions.

***Wild & Scenic Rivers
Comment #2*** ***The Final Revised Plan needs additional Wild & Scenic
River recommendations - numerous candidate rivers
listed aside from Tongue & Little Bighorn, including
South Fork Rock, Shell, Paintrock, Porcupine, North
Piney, Leigh Creek, North Paintrock, Medicine Lodge.***

The ID Team recommended the Tongue and Little Bighorn for incorporation into Alternative D-FEIS. South Fork Rock Creek would be managed to maintain its current characteristics (primarily through Management Area 1.2 Recommended Wilderness. Shell Creek did not meet the criteria of eligible (because it is not free-flowing) and therefore was not deemed suitable for inclusion in the range of alternatives. Paintrock and Porcupine were not included in Alternative D-FEIS because the ID Team decided to focus the Little Bighorn and Tongue Rivers for these alternatives. North Piney was not included because it is typical of most rivers on the forest. Leigh Creek was not included since it was better suited within MA 2.2 (RNA) and it, too, is typical of most small creeks on the Forest. Medicine Lodge Creek was not determined to have any outstandingly remarkable values that made it eligible for suitability analysis.

***Wild & Scenic Rivers
Comment #3*** ***The Forest needs to recommend the Tongue River as
Wild & Scenic in the Revised Forest Plan.***

This change was made, up to the point where the river enters Management Area 4.2 (scenery) near the highway corridor. The 4.2 management area allocation will result in a management approach similar to that of a recreation (MA 4.4) or scenery (MA 3.4) river, providing for retention of the values associated with that part of the river. There are several reasons why MA 4.2 is most appropriate for the upper portion of the river. It would provide a consistent approach to the majority of the scenic byway corridor (since the rest is in MA 4.2) and it allows for additional management flexibility with regard to the U.S. Highway since under certain situations, Section 7 of the Wild and

Scenic Rivers Act could potentially preclude highway projects along this critical corridor (bridgework, etc), should the upper Tongue be allocated to MA 3.4 or MA 4.4.

***Wild & Scenic Rivers
Comment #4*** ***The eligibility portion of the Wild & Scenic Rivers evaluation process was not done properly. The process was too subjective.***

The evaluation process was based on the best sources of information available - the river listings of the Nationwide Rivers Inventory, the 1988 American Rivers inventory list, and a December 2000 letter from the Wyoming Chapter of the Sierra Club. No additional rivers were identified through initial public scoping. Based on this input, members of the ID Team met with each of the Ranger Districts to validate this list of potentially eligible rivers, which were then analyzed for outstandingly remarkable values, potential classification, and suitability for recommendation. For the Final Plan / EIS, Leigh Creek was considered based on public comment but the Team concluded that its current allocation in D-FEIS as Management Area 2.2. (Research Natural Area) was most appropriate. With regard to a quantifiable process, FSH 1909.12,8 clearly states that "The determination that a river area contains "outstandingly remarkable" values is a professional judgment on the part of the study team. There is no known way to write criteria to mechanically or automatically determine that certain values are so rare or unique as to make them outstandingly remarkable."

***Wild & Scenic Rivers
Comment #5*** ***Don't manage the Tongue River as a Wild & Scenic River.***

Public comment demonstrated a clear rationale as to why the Tongue should be managed as a wild and scenic river recommendation, including the state of Wyoming. It was recommended in the 1985 Plan and was recommended in the Revised Plan as well. Allocation of wild, scenic, and recreation river management areas was done in a way that maintains current uses of the area but preserves the unique features that need protection within the river corridor.

***Wild & Scenic Rivers
Comment #6*** ***We support continuing to allow over-snow motorized travel within Wild & Scenic River corridors as outlined by the draft Plan.***

In fact, this was an error in the Draft Revised Plan which was corrected for the Final Revised Plan. The Little Bighorn area has been closed to over-snow motorized travel under the 1985 Plan, and Management Area 1.5 has been revised to correct this. Wild rivers are not compatible with snowmobile travel, as shown on the current travel map and as such, this would not have in fact been a "continuation" of allowing over-snow travel since it hadn't been previously allowed. Scenic (MA 3.4) and recreation rivers

(MA 4.4) would allow snowmobiling.

Wilderness

<i>Wilderness Comment #1</i>	<i>Recommend additional areas for wilderness designation to --</i>
	<i>1. protect lower elevation ecosystems and habitats</i>
	<i>2. protect wildlife from roads</i>
	<i>3. provide non-motorized backcountry recreation</i>
	<i>4. provide a longer season of use</i>
	<i>5. preserve a non-renewable resource</i>
	<i>6. provide places for human renewal</i>
	<i>7. meet growing demand for wilderness</i>
	<i>8. protect watersheds and vegetation</i>
	<i>9. protect areas from growing motorized use</i>
	<i>10. expand wilderness opportunities in northeast Wyoming</i>
	<i>11. provide hunting and fishing opportunities</i>
	<i>12. serve the national interest</i>
	<i>13. enhance local economic contributions of recreation, hunting and fishing</i>

The factors considered in evaluating potential wilderness and determining the need to designate roadless areas as wildernesses are outlined in Forest Service Handbook (FSH) 1909.12 Chapter 7. Need was evaluated in terms of geographic distribution of wilderness areas and human populations, existing wilderness use, other unconfined recreation opportunities, wildlife needs, ecosystems represented, the presence of wildlife expected to be visible in a wilderness environment, and the opportunity to provide primitive outdoor recreation, and local and national attitudes. (FSH1909.12.7.23). Additionally, wilderness designation may offer opportunities to preserve native plant and animal habitats and populations, the natural heritage of an area, and serve as reference landscapes. Research Natural Areas and Wild and Scenic River Management Area allocations may offer similar protection opportunities.

The interdisciplinary team considered a range of alternatives with varied wilderness recommendations. Before recommending an area for wilderness, the decision-maker must consider the need for new wilderness along with a wide-range of multiple use demands on the Bighorn National Forest System lands. See the roadless section of FEIS Chapter 3, FEIS Appendix C, and the administrative record for a complete discussion of the evaluation of and need for new wilderness.

Wilderness
Comment #2 *Recommend areas for wilderness designation:*
The five areas in Alternative C - Little Bighorn, Devils Canyon, Rock Creek, Walker Prairie, and Medicine Lodge
Rock Creek
Rock Creek, Little Horn and Walker Prairie
Rock Creek, Paintrock Creek, Tongue River, Little Bighorn and Porcupine Creek
Lodge Grass Creek, Pete's Hole, and Cedar Creek
Buck Creek Vees
Piney Creek/Penrose/Little Goose
Redraw boundaries of areas recommended for wilderness to include:
all areas included in the roadless rule
all capable and available roadless areas
all areas included in the RARE II
all areas included in the Forest
the RNA adjacent to the Rock Creek M.A. 1.2 in Alternative C
wild river adjacent to the Rock Creek M.A. in 1.2 in Alternative C

Based on public comment in favor of wilderness, the Rock Creek area was recommended for wilderness designation in Alternative D-FEIS.

FSH 1909.12 - 7.2 directs that for an area to be recommended as wilderness, it must be inventoried roadless and considered capable and available for wilderness designation. Capability is defined as "the degree to which that area contains the basic characteristics that make it suitable for wilderness designation without regard to its availability for or need as wilderness." Principle wilderness characteristics include: environment, challenge, outdoor recreation opportunities, special features, and manageability (FSH 1090.12.7.21). "The determination of availability is conditioned by the value of and the need for the wilderness resource compared to the value of and need for other resources (FSH 1909.12.7.22)." Many acres of the Bighorn are roaded or have some other type of development that precludes them from being capable of wilderness designation. Constraints and encumbrances on lands, as well as, a wide range of demands for multiple resources may preclude the availability of areas determined to be capable for wilderness designation.

Each of the suggested areas was evaluated for roadless qualities. For a specific area to be recommended as wilderness, it must be inventoried as "roadless" and determined to be capable and available for wilderness designation. The roadless section of FEIS Chapter 3 and FEIS Appendix C describe this evaluation process. The Interdisciplinary Team considered all the resource needs and identified areas to be considered for wilderness recommendation in the alternatives.

Other management area designations that offer protection of special and unique qualities include MA 2.2 research natural areas, MA 1.5 wild rivers and MA 3.4 scenic rivers and MA MW Medicine Wheel.

COMMENTS AND RESPONSES

Alternative D-FEIS includes the potential Pheasant Creek RN. in the Rock Creek MA 1.2 recommended for wilderness designation. A portion of the potential South Rock Creek wild river is included in the Rock Creek MA 1.2.

<i>Wilderness Comment #3</i>	<i>Do not recommend additional areas for wilderness designation because</i> <ol style="list-style-type: none"><i>1. the management is too constrained</i><i>2. the designation attracts additional users</i><i>3. additional wilderness is not needed</i><i>4. it will make access more difficult for hunters</i><i>5. it interferes with management of insects, disease, and fuels for forest health</i><i>6. it interferes with maximum beneficial use</i><i>7. the number of wilderness users is small and not increasing</i><i>8. motorized access is needed to maintain range improvements</i><i>9. people with physical or age restrictions are excluded</i><i>10. it is not multiple use management</i><i>11. it excludes motorized winter recreation</i>
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The consequences of not recommending any additional wilderness were analyzed in Alternatives A, B, D-DEIS, and E.

<i>Wilderness Comment #4</i>	<i>Stocking non-native and naturalized species of sport fish in wilderness is</i> <ol style="list-style-type: none"><i>1. Contrary to the standard of limiting activities in wilderness to those dependent on the wilderness resource.</i><i>2. Degrading the wilderness by the use of rotary aircraft over wilderness, concentrating users around stocked waters, and interfering with the aquatic ecosystem.</i>
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The Wilderness Act of 1964 clearly supports the state's jurisdiction and responsibility for managing fish and wildlife (Sec 4d(8)). In order to provide direction within and between multiple agencies with divergent missions, a Memorandum of Understanding (MOU) was developed between the Forest Service, Bureau of Land Management, and the International Association of Fish and Wildlife Agencies (States) in 1986. Policies and guidelines regarding fish stocking are outlined in this agreement. The order of preference for stocking fish is: (a) federally-listed threatened or endangered indigenous species, and (b) indigenous species. While stocking of exotic fish species is not allowed, species of fish traditionally stocked before wilderness designation may be considered indigenous if the species is likely to survive.

The Forest Service will continue to work with the Wyoming Game and Fish Department to emphasize the protection of natural processes and indigenous fish populations in wilderness. The MOU also directs that aerial fish stocking be permitted for those waters in wilderness where this was an established practice before wilderness designation or where other practical means are not available. The Forest Service does not have jurisdiction over air space, but continues to work with the Wyoming Game and Fish Department to develop management activities that are compatible with wilderness management objectives.

- Wilderness** ***Protect designated Wilderness by***
Comment #5 ***1. Providing semi-primitive non-motorized opportunities***
 outside Wilderness
 2. Providing buffer areas between motorized use and
 Wilderness
 3. Using education and regulation as necessary to control and
 reduce physical and social impacts of human use
 4. Considering impacts of new developed recreation and
 associated access on Wilderness

Alternative D-FEIS allocates several areas adjacent to the existing Cloud Peak Wilderness to backcountry management. The strategies, standards, and guidelines in the Revised Plan provide tools to for management of impacts in wilderness. Proposals for new recreation and road developments are outside the scope of the forest plan process.

- Wilderness** ***Pre-existing motorized uses should be allowed to continue with***
Comment #6 ***appropriate monitoring in areas recommended for wilderness***
 designation.

The Rock Creek area allocated to MA 1.2 recommended for wilderness does not include pre-existing motorized uses.

- Wilderness** ***Do not recommend any area that would threaten the Bighorn***
Comment #7 ***Mountain Wild and Scenic Trail Run for wilderness designation.***

The conflict between the Trail Run and Wilderness management was noted and considered in the inventory and evaluation of the Little Bighorn and Tongue roadless areas (FEIS Appendix C). The Trail Run is consistent with the wild and scenic management area designations in Alternative D-FEIS.

Wildlife

Wildlife
Comment #1 *Lynx Management: The Forest has inadequate management direction for lynx – there should be more standards and no timber harvest allowed in lynx habitat. There is too much management direction for lynx, and the Forest should not have to manage for lynx since they have not occurred recently.*

While both comments for and against lynx management were received, the Bighorn National Forest has tiered to the Northern Rockies Lynx Amendment (NRLA) process in both the Draft and Final Revised Plan and EIS. Following this amendment process has led to the incorporation of the most applicable science and applied knowledge with regards to lynx management for the Bighorn NF. In addition, between the Draft and Final, a new Lynx Conservation Agreement was signed by the Forest Service and the U.S. Fish and Wildlife Service. This Agreement states that management direction applicable to lynx will only be used if lynx occur on the Forest. Currently, the Bighorn NF does not have any lynx occurring.

The Forest completed a Biological Assessment for the Draft and Final EIS that included the effects of the preferred alternative (DFEIS), including its management direction and anticipated management activities, and consulted with the U.S. Fish and Wildlife Service (USFWS) between the draft and final EIS. A letter of concurrence was received (Refer to Appendix F in FEIS) from the USFWS, demonstrating agreement with the Forest's approach to management and the effects of it upon lynx. The Bighorn NF's intent in managing for lynx was clarified for the Final Plan and EIS through the addition of a strategy (Refer to Chapter 1 of the Revised Plan) in response to public comment.

The response to this comment is more directly related to the provisions for management direction in the Northern Rockies Lynx Amendment (NRLA) process. The Forest tiered to the NRLA process, which was included in the Bighorn's DEIS and proposed Revised Plan by incorporating the current preferred alternative from the NRLA DEIS (Alternative E) that was available at the time the Bighorn's DEIS was published. Tiering to the NRLA process also means that the public had an opportunity to comment on the proposed management direction that was published with the NRLA DEIS. The public comment period for the NR DEIS was from 1/16/04 to 4/16/04, and the Bighorn's DEIS comment period was from 7/1/04 to 9/30/04. Since that time, there has been a new preferred alternative developed for the NRLA, however it was not finalized in time for the Bighorn NF to incorporate it directly. As such, at the request of the USFWS, for the Final Plan and FEIS, the Forest instead used the conservation measures and management direction consistent with the Lynx Conservation Assessment and Strategy, which was included in the NRLA DEIS as Alternative B. By so doing, the USFWS desired to consult on new plan management direction only once (through the NRLA process) for administrative efficiency, rather than consulting on a unique set of management direction developed by the Forest. The public had an opportunity to

comment on the use of the Alternative B management direction through the DEIS released for the NRLA. It is anticipated that the NRLA process will be completed within a few months of the Bighorn's FEIS, ROD, and Revised Plan. With completion of the NRLA, the Bighorn's Revised Plan would be amended with the new management direction from the NRLA, as indicated in the strategy developed in the Bighorn's Revised Plan (See Chapter 1). Tiering to the NRLA process fulfills both the NEPA and NFMA requirement of public involvement for the Bighorn's plan direction.

With regard to the comment regarding too much management emphasis for lynx, the new Lynx Conservation Agreement (USDA Forest Service 2005) states that lynx will only be managed for if they are known to occur on the Forest. Lynx are not currently known to occur, though they historically did, although it was unknown if it was a self-sustaining population or not. Individuals have also been documented in the Greater Yellowstone Area, which is likely an easy travel distance for lynx to get to the Bighorn NF from there. In addition, the USFWS has yet to establish critical habitat for the lynx, which could potentially affect the Forest's future management for lynx.

Wildlife

Comment #2

Elk Security: The Plan/EIS does not contain adequate management direction for elk security habitat

The Plan/EIS contains too much management direction for elk security habitat

The Plan/EIS contains the wrong management emphasis for elk security

Logging activity should not be allowed in elk security habitat.

The Forest included modifications suggested to the elk security management direction received from public comment. This included direct involvement by the Wyoming Game and Fish Department. Elk security management direction was retained due to the use of elk as a Management Indicator Species, the importance this type of habitat to other species on the Forest, and the known need to incorporate road density considerations with cover elements from past experience implementing the 1985 plan, which dealt only with hiding cover. Due to the newness and uncertain implementation success with the elk security direction, it was retained as a forest-wide guideline (Refer to Chapter 1 of the Revised Plan), rather than elevated to a standard. The discrepancy in the amount of elk security to manage for that existed between the forestwide strategy and the forest-wide guideline was rectified for the FEIS and plan based on public input. Effects to elk security habitat were displayed in the FEIS under the wildlife effects section of Chapter 3. Additional implementation guidance for this direction was added to Appendix A of the Revised Plan. Logging activity was allowed to occur within elk security habitat, depending on management prescription, as it is anticipated that this type of habitat can be successfully rotated on the landscape in response to natural and management induced disturbances.

COMMENTS AND RESPONSES

Wildlife
Comment #3 ***Goshawks and wildlife: Management direction should have been standards for goshawks, not guidelines; Logging should not be allowed in goshawk habitat; Management direction should have been more specific with buffers clearly defined for goshawks; More management direction for wildlife should have been included in the plan as standards, not as unenforceable guidelines.***

The Forest made a distinction in management direction for sensitive species vs. threatened and endangered species. Most management direction for sensitive species was retained as guidelines, as often a lack of information on distribution or habitat needs accompany these species, whereas threatened or endangered species typically have more research applied to their needs resulting in the more sound use of standards. The source of management direction for goshawks was clarified in the Revised Plan, as suggested by public comment, and management direction was retained as a guideline for the reason stated above. In addition, the sources of management direction used for development of the Revised Plan guidance were developed as guidelines, with anticipated variance in application at the site-specific scale, and allow for disturbances such as timber harvest. The definition of guidelines was edited for clarity for the Revised Plan to show the intent on using them for project design and analyses, and to describe the public involvement allowed for in project specific analyses and use of guidelines.

Wildlife
Comment #4 ***Wolves, Grizzlies, Lynx: Management direction should have been incorporated as standards for these species, and opportunities for reintroduction should have been examined.***

With regard to the reintroduction of threatened species, the Forest included an Alternative Considered but Not Analyzed in Detail in Chapter 2 of the FEIS. Reintroduction of listed species is not within the jurisdiction of the Forest Service. As also addressed in the Biodiversity effects section of the FEIS, and the Biological Assessment, the State's management plan for grizzlies does not call for retention of this species on the Forest as it is outside of the recovery area and risks to human safety are of paramount concern. In the absence of an approved state wolf management plan, management for wolves would continue as directed under the 1994 FEIS issued for the reintroduction of wolves into Wyoming. Wolves would likely continue to occur on the Forest, with livestock depredation being of concern and addressed in conjunction with the U.S. Fish and Wildlife Service and the USDA APHIS Wildlife Services agencies. The Forest would coordinate and consult with the USFWS on any management activities involving either of these species when or should they occur. Part of the agreement for reintroducing wolves within WY, as addressed in the reintroduction FEIS, was that additional management requirements for wolves would not be required on National Forest lands in the forms of forest plan guidance.

Wildlife ***MIS: Additional or different species should have been selected for***
Comment #5 ***use as Management Indicator Species for the Revised Plan.***

The approach to the selection of Management Indicator Species was documented in the project record (Refer to MIS Selection Process document). All species suggested to the Forest for consideration were addressed in that document. The Forest's approach to selection and use of MIS was to identify which habitats were likely to be manipulated by the Forest through routine management activities, and select species tied to those habitats and the management issues surrounding them. In addition, the Forest clarified the monitoring approach in the Revised Plan with adherence to the opportunity presented in the 2004 planning regulations for habitat monitoring, rather than population monitoring (36 CFR 219.14(f)).

Wildlife ***Bighorn Sheep: Management effects from livestock grazing will***
Comment #6 ***not allow for the viability of bighorn sheep.***

Bighorn sheep were selected as a species of local concern (Refer to Appendix C of the Revised Plan). The management issues associated with the bighorn sheep were described in the species assessment conducted as described in the project record, and include the known potential for disease transmission from domestic sheep. The Forest has participated in an interagency management priority group to emphasize management to benefit bighorn sheep within Wyoming. This has led to the Forest accepting domestic sheep grazing from the Shoshone NF in recent years to improve the opportunity for survival of the sheep in priority herds within the state. The presence of domestic sheep on private land adjacent to the Forest, within bighorn sheep winter range from sheep occupying the Forest, would allow for the continued potential for disease interaction to occur even if domestic sheep grazing did not occur on the Forest. Management direction (forest-wide guidelines) was included in the Revised Plan to improve management for bighorn sheep.

Wildlife ***Cumulative Effects: The Forest neglected to include cumulative***
Comment #7 ***effects of hunting or other sources of mortality in analyzing effects***
 to wildlife..

The Forest improved its assessment of cumulative effects to emphasis species in the FEIS, as described in the wildlife effects analysis section in Chapter 3 of the FEIS.